

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

G&A STRATEGIC INVESTMENTS I LLC, et al.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A. et al.,

Defendants.

No. 23-cv-10766-JSR

(Consolidated with Case No. 1:23-cv-10772-JSR and Case No. 1:24-cv-04448-JSR)

GIRARD STREET INVESTMENT HOLDINGS LLC,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A. et al.,

Defendants.

No. 23-cv-10772-JSR

(Consolidated with Case No. 1:23-cv-10766-JSR and Case No. 1:24-cv-04448-JSR)

GIRARD STREET INVESTMENT HOLDINGS LLC,

Plaintiff,

v.

PDV HOLDING, INC.,

Defendant.

No. 24-cv-04448-JSR

(Consolidated with Case No. 1:23-cv-10766-JSR and Case No. 1:23-cv-10772-JSR)

**DECLARATION OF EVAN GLASSMAN IN SUPPORT
OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

I, Evan Glassman, hereby declare and state as follows:

1. I am a partner at the law firm Steptoe LLP (“Steptoe”), counsel for the Plaintiffs in the above-captioned cases against Petróleos de Venezuela, S.A. (“PDVSA”), PDVSA Petróleo, S.A. (“Petróleo”), and PDV Holding, Inc. (“PDVH”) (collectively, “Defendants”). I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I respectfully submit this Declaration pursuant to 28 U.S.C. § 1746 in support of Plaintiffs' Motion for Summary Judgment. I have personal knowledge about the information contained in this Declaration.

3. Attached as Exhibit 1 is a true and correct copy of the Gramercy Firm Overview Presentation, produced as G_000303369 and dated April 2024 (CONFIDENTIAL).

4. Attached as Exhibit 2 is a true and correct copy of the Delaware Certificate of Formation for Gramercy Funds Management LLC, produced as G_000040928 and dated November 24, 2010 (CONFIDENTIAL).

5. Attached as Exhibit 3 is a true and correct copy of the Girard Street Structure Chart, prepared for the February 21, 2025 30(b)(6) deposition of Robert Lanava and produced as G_000305479 (CONFIDENTIAL).

6. Attached as Exhibit 4 is a true and correct copy of excerpts from Robert Lanava's 30(b)(6) deposition dated February 21, 2025 (HIGHLY CONFIDENTIAL).

7. Attached as Exhibit 5 is a true and correct copy of excerpts from Robert Koenigsberger's deposition dated February 11, 2025 (HIGHLY CONFIDENTIAL).

8. Attached as Exhibit 6 is a true and correct copy of excerpts from Nicholas Paolazzi's deposition dated January 13, 2025 (HIGHLY CONFIDENTIAL).

9. Attached as Exhibit 7 is a true and correct copy of the Cayman Islands Certificate of Registration for Girard Street Investment Holdings LLC, dated November 19, 2020 and produced as G_000036648.

10. Attached as **Exhibit 8** is a true and correct copy of a Gramercy Funds Management LLC chart depicting PDVSA Promissory Note Ownership, produced as G_000057713 and dated February 24, 2020 (HIGHLY CONFIDENTIAL).

11. Attached as **Exhibit 9** is a true and correct copy of excerpts from James Taylor's 30(b)(6) deposition dated February 18, 2025 (HIGHLY CONFIDENTIAL).

12. Attached as **Exhibit 10** is a true and correct copy of PDVSA and Petróleo's Answer and Affirmative Defenses to G&A's Amended Complaint, filed as ECF No. 94 in *G&A Strategic Investments I LLC, et al. v. Petróleos De Venezuela, S.A., et al.*, 23-cv-10776-JSR (SDNY) ("G&A Strategic Invs."), dated December 5, 2024.

13. Attached as **Exhibit 11** is a true and correct copy of PDVSA's Form 20-F annual report for the fiscal year ended December 31, 2022, dated October 24, 2003.

14. Attached as **Exhibit 12** is a true and correct copy of excerpts Defendants and Counterclaim Plaintiffs' Response to Plaintiffs and Counterclaim Defendants' Rule 56.1 Statement of Undisputed Facts and Rule 56.1 Counterstatement of Additional Material Undisputed Facts, filed as ECF No. 163 in *Petróleos De Venezuela, S.A., et al. v. MUFG Union Bank, N.A., et al.*, 18-cv-10023-KPF (SDNY) ("MUFG Union Bank"), dated July 6, 2020 and produced as G_000101304.

15. Attached as **Exhibit 13** is a true and correct copy of the Amended Complaint, filed as ECF No. 47 in *Gramercy Distressed Opportunity Fund, LLC. v. PDV Holding, Inc., et al.*, 24-cv-02981 (S.D. Tex.), dated October 16, 2024 and produced as G_000302226.

16. Attached as **Exhibit 14** is a true and correct copy of Venezuela's Supreme Tribunal of Justice, Constitutional Chamber Decision No. 464, dated March 18, 2002 and produced as G_000000254.

17. Attached as **Exhibit 15** is a true and correct copy of the 1999 Constitution of the Bolivarian Republic of Venezuela, filed as ECF No. 126-4 in MUFG Union Bank, dated June 16, 2020 and produced as G_000012943.

18. Attached as **Exhibit 16** is a true and correct copy of the Amended Complaint, filed as ECF No. 89 in G&A Strategic Invs., dated November 21, 2024 and produced as G_000099976.

19. Attached as **Exhibit 17** is a true and correct copy of the Note Agreement among PDVSA, Petróleo and Servicios Halliburton de Venezuela, S.A. for \$200,000,123.50 6.5% Senior Guaranteed Note, Series 2016E, dated June 29, 2016 and produced as G_000300913 (CONFIDENTIAL).

20. Attached as **Exhibit 18** is a true and correct copy of PDVSA's Form 20-F report for the fiscal year ended December 31, 2004, dated November 17, 2006 and produced as G_000032737.

21. Attached as **Exhibit 19** is a true and correct copy of excerpts from Gina Coon's deposition dated February 7, 2025

22. Attached as **Exhibit 20** is a true and correct copy of PDVH's corporate overview webpage, produced as G_000098001.

23. Attached as **Exhibit 21** is a true and correct copy of PDVH's FARA Registration Statement, filed August 20, 2021 and produced as PDVH_Girard Street_000007624.

24. Attached as **Exhibit 22** is a true and correct copy of PDVH's FARA Supplemental Statement, filed March 28, 2024 and produced as PDVH_Girard Street_000007750.

25. Attached as **Exhibit 23** is a true and correct copy of Citgo Holding, Inc.'s News Release: "Citgo Holding, Inc. Announces the Expiration and Final Results of Offer to Purchase up to \$472. 975 Million in Aggregate Principal Amount of Its 9.25% Senior Secured Notes Due 2024," dated June 12, 2023.

26. Attached as **Exhibit 24** is a true and correct copy of the diagram titled "OPEC Share of World Crude Oil Reserves, 2023," produced as G_000096259.

27. Attached as **Exhibit 25** is a true and correct copy of Citgo's 2023 Annual Report "Pursuing Excellence," produced as G_000035441.

28. Attached as **Exhibit 26** is a true and correct copy of a document titled "Note Agreement among Petróleos de Venezuela, S.A., as Issuer, PDVSA Petróleo, S.A., as Guarantor, GE Capital EFS Financing, Inc., as Initial Noteholder, and GE Capital EFS Financing, Inc., as Administrative Agent," dated May 13, 2016, for \$193,959,763.03 6.5% Senior Guaranteed Note. This document was filed in *Red Tree Investments, LLC v. Petróleos de Venezuela, SA*, Index No. 651005/2019 (S.Ct. NY) at NYSCEF Doc. No. 7.

29. Attached as **Exhibit 27** is a true and correct copy of a July 13, 2022 email from: G. Coon, To: S. McNabb; and O. Montenegro, and its attached presentation: "PDV Holding, Inc. – Organizational review," dated May 19, 2021 and produced as PDVH_Girard Street_000009328 (CONFIDENTIAL).

30. Attached as **Exhibit 28** is a true and correct copy of Citgo's "Summary Of 'All Active' Legal Entities," Updated on May 11, 2021, PDVH_Girard Street_000009346 (HIGHLY CONFIDENTIAL).

31. Attached as **Exhibit 29** is a true and correct copy of excerpts from Robert Shoemaker's personal deposition dated February 27, 2025.

32. Attached as **Exhibit 30** is a true and correct copy of the PDVSA and Citgo corporate structure organizational chart, updated as of November 7, 2024, produced as PDVH_Girard Street_000107515 (CONFIDENTIAL).

33. Attached as **Exhibit 31** is a true and correct copy of the PDVSA and Citgo corporate structure organizational chart, updated as of February 12, 2015, produced as PDVH_Girard Street_000107494 (CONFIDENTIAL).

34. Attached as **Exhibit 32** is a true and correct copy of the PDVSA and Citgo corporate structure organizational chart, dated January 5, 2021, produced as PDVH_Girard Street_000107506 (CONFIDENTIAL).

35. Attached as **Exhibit 33** is a true and correct copy of PDVH “Minutes of a Special Meeting of the Board of Directors Held on June 29, 2021, produced as PDVH_Girard Street_000000927 (CONFIDENTIAL).

36. Attached as **Exhibit 34** is a true and correct copy of a PDVH Board of Directors meeting presentation, “Citgo Aruba Update,” dated June 29, 2021 and produced as PDVH_Girard Street_000107659 (HIGHLY CONFIDENTIAL).

37. Attached as **Exhibit 35** is a true and correct copy of an email from: L. Palacios, to: L. Pacheco re: Attachments, with attached presentation, “Citgo Aruba Summary,” dated May 19, 2019 and produced as PDVSA_0036992 (CONFIDENTIAL).

38. Attached as **Exhibit 36** is a true and correct copy of a PDVH Board of Directors meeting presentation, “2020 Summary,” dated June 29, 2021 and produced as PDVH_Girard Street_000107669 (HIGHLY CONFIDENTIAL).

39. Attached as **Exhibit 37** is a true and correct copy of PDVH's Consolidated Financial Statements as of December 31, 2017 and 2016 and Independent Auditors' Report, dated June 28, 2018 and produced as PDVH_Girard Street_000013878 (HIGHLY CONFIDENTIAL).

40. Attached as **Exhibit 38** is a true and correct copy of PDVH interoffice memorandum To: December 31, 2015 Audit Files, From: PDVH, re: "Analysis of Accounting Treatment Related to Chalmette Refining, LLC Sale – GAAP, dated June 12, 2016 and produced as PDVH_Girard Street_000020858 (CONFIDENTIAL).

41. Attached as **Exhibit 39** is a true and correct copy of the Expert Report of Francisco Rodríguez, Ph.D., dated December 12, 2024 (CONFIDENTIAL).

42. Attached as **Exhibit 40** is a true and correct copy of Francisco Rodríguez's academic paper: "The economic determinants of Venezuela's hunger crisis," dated June 23, 2022 and produced as G_000099486.

43. Attached as **Exhibit 41** is a true and correct copy of the World Bank's Report No. 46551-EC: "Ecuador: Diversification and Sustainable Growth In an Oil-Dependent Country," dated March 31, 2010 and produced as G_000099519.

44. Attached as **Exhibit 42** is a true and correct copy of Michael L. Ross, "Does Oil Hinder Democracy?," World Politics 53, 325 (Apr. 2001), produced as G_000099248.

45. Attached as **Exhibit 43** is a true and correct copy of Xavier Sala-i-Martin and Arvind Subramanian, "Addressing the Natural Resource Curse: An Illustration from Nigeria," 22 Journal of African Economies 4, 570 (Dec. 2012), produced as G_000099406.

46. Attached as **Exhibit 44** is a true and correct copy of Thad Dunning's academic essay: "Natural Resource Wealth and Political Regimes," produced as G_000099693 and dated 2009.

47. Attached as **Exhibit 45** is a true and correct copy of Francisco Rodríguez's World Bank research essay: "The Political Economy of Latin American Economic Growth," produced as G_000099178.

48. Attached as **Exhibit 46** is a true and correct copy of PDVSA's offering circular to exchange U.S. dollar denominated unsecured notes due April 2017 and November 2017 for U.S. dollar denominated 8.50% senior secured notes due 2020, dated September 16, 2016, produced as PDVSA_0023574 (CONFIDENTIAL).

49. Attached as **Exhibit 47** is a true and correct copy of the declaration of José Ignacio Hernández in support of Venezuela's motion for an order authorizing the issuance of a writ of attachment *fieri facias*, produced as PDVH_Girard Street_000134939 (CONFIDENTIAL).

50. Attached as **Exhibit 48** is a true and correct copy of a Citgo Petroleum presentation: "Company Profile," produced as PDVH_Girard Street_000008771 (CONFIDENTIAL).

51. Attached as **Exhibit 49** is a true and correct copy of the Press Statement titled "Sanctions Against PDVSA and Venezuela Oil Sector," issued by Michael R. Pompeo, Secretary of State, in Washington, D.C., dated January 28, 2019.

52. Attached as **Exhibit 50** is a true and correct copy of the Council on Foreign Relations timeline: "Venezuela's Chavez Era."

53. Attached as **Exhibit 51** is a true and correct copy of the PBS Frontline World article: “Hugo Chavez Comes to Power,” dated August 2003.

54. Attached as **Exhibit 52** is a true and correct copy of the document titled “Bank Statements - US Reports” for Citgo Holding, Inc., issued by Citibank, N.A. for account number 3888-4438, covering the period from February 6, 2015, to February 28, 2015, produced as PDVH_Girard Street_000031017 (HIGHLY CONFIDENTIAL).

55. Attached as **Exhibit 53** is a true and correct copy of Minutes of a Special Meeting of the Board of Directors of PDV Holding, Inc., held on October 27, 2021, produced as PDVH_Girard Street_000000969 (CONFIDENTIAL).

56. Attached as **Exhibit 54** is a true and correct copy of a Reuters article: “Information-Oil Service Companies Operating in Venezuela,” dated June 24, 2010 and produced as G_000096391.

57. Attached as **Exhibit 55** is a true and correct copy of a France 24 article: “Venezuela seizes major US oil project, local company assets,” dated September 5, 2009.

58. Attached as **Exhibit 56** is a true and correct copy of a Voice of America article: “Venezuela Seizes Assets of 60 Oil Services Companies,” dated November 2, 2009.

59. Attached as **Exhibit 57** is a true and correct copy of a Reuters article: “Haliburton curtailing business activity in Venezuela,” dated April 22, 2016 and produced as G_000096562.

60. Attached as **Exhibit 58** is a true and correct copy of the 2016 Haliburton annual report, produced as G_000108908.

61. Attached as **Exhibit 59** is a true and correct copy of Haliburton's webpage: "About Haliburton," produced as G_000096345.

62. Attached as **Exhibit 60** is a true and correct copy of a Haliburton case study: "Petroindependencia Drills the Longest ERD Well While Staying 100 Percent in Target Zone," produced as G_000095981.

63. Attached as **Exhibit 61** is a true and correct copy of Haliburton's form 10-K annual report for the fiscal year ended December 31, 2015, dated February 5, 2016.

64. Attached as **Exhibit 62** is a true and correct copy of Schlumberger N.V.'s form 10-K annual report for the fiscal year ended December 31, 2016, dated January 25, 2017 and produced as G_000104202.

65. Attached as **Exhibit 63** is a true and correct copy of a Schlumberger case study: "Drilling and Workover Efficiency Save USD 26 Million for PDVSA," dated December 2006 and produced as G_000097638.

66. Attached as **Exhibit 64** is a true and correct copy of Schlumberger N.V.'s form 10-K annual report for the fiscal year ended December 31, 2014, dated January 29, 2015.

67. Attached as **Exhibit 65** is a true and correct copy of Schlumberger N.V.'s form 10-K annual report for the fiscal year ended December 31, 2015, dated January 27, 2016.

68. Attached as **Exhibit 66** is a true and correct copy of the Supplemental Statement filed by PDV Holding, Inc. with the U.S. Department of Justice under the Foreign Agents Registration Act of 1938, covering the six-month period ending on August 31, 2022, produced as PDVH_Girard Street_000007705.

69. Attached as **Exhibit 67** is a true and correct copy of a Central Bank of Venezuela spreadsheet containing data on total external debt series 1997-2018, produced as G_000325369.

70. Attached as **Exhibit 68** is a true and correct copy of Weatherford International plc form 10-k annual report for the fiscal year ended December 31, 2014.

71. Attached as **Exhibit 69** is a true and correct copy of a Reuters article, “Exclusive: Venezuela’s PDVSA quietly issues new debt to pay off suppliers,” dated May 3, 2016.

72. Attached as **Exhibit 70** is a true and correct copy of the Supplemental Statement filed by PDV Holding, Inc. with the U.S. Department of Justice under the Foreign Agents Registration Act of 1938, covering the six-month period ending on February 28, 2023, produced as PDVH_Girard Street_000007720.

73. Attached as **Exhibit 71** is a true and correct copy of a letter from Horacio Medina, President of the Ad Hoc Management Board of Petróleos de Venezuela, S.A. (PDVSA), dated December 7, 2021, produced as PDVSA_0005116 (HIGHLY CONFIDENTIAL).

74. Attached as **Exhibit 72** is a true and correct copy of an email exchange dated January 25, 2022, between Julian Cardenas and Mireya Ripanti, with copies to Horacio Medina, Fernando Vera, and Samuel Wilhelm, regarding “Re: Average executed per License for PDVSA Ad Hoc Legal Services Payment,” produced as PDVSA_0005114 (HIGHLY CONFIDENTIAL).

75. Attached as **Exhibit 73** is a true and correct copy of Exhibit B to the Foreign Agents Registration Act of 1938 Registration Statement filed by Klein/Johnson Group LLC with the U.S. Department of Justice, received by the NSD/FARA Registration Unit on June 17, 2022 and produced as G_000319340.

76. Attached as **Exhibit 74** is a true and correct copy of the September 16, 2016 PDVSA Offering Circular, previously filed in *Petróleos de Venezuela SA v. MUFG Union Bank*, 19 cv 10023 (SDNY) and produced in this matter as G_000011624.

77. Attached as **Exhibit 75** is a true and correct copy of the abstract and publication details for the report: “An estimate of recoverable heavy oil resources of the Orinoco Oil Belt, Venezuela,” dated 2009 and produced as G_000099245.

78. Attached as **Exhibit 76** is a true and correct copy of Schlumberger N.V.’s form 10-K annual report for the fiscal year ended December 31, 2016, dated January 25, 2017.

79. Attached as **Exhibit 77** is a true and correct copy of Weatherford International plc’s form 10-K annual report for the fiscal year ended December 31, 2016, dated February 14, 2017.

80. Attached as **Exhibit 78** is a true and correct copy of Weatherford International plc’s form 10-K annual report for the fiscal year ended December 31, 2017, dated February 14, 2018.

81. Attached as **Exhibit 79** is a true and correct copy of a press release: “The ad hoc administrative board of Petroleos de Venezuela, S.A. announces that the National Assembly of the Bolivarian Republic of Venezuela has authorized the payment of interest on the PDVSA 2020 bond,” dated May 29, 2019 and produced as PDVSA_0050523 (CONFIDENTIAL).

82. Attached as **Exhibit 80** is a true and correct copy of Torino Economics’ “Venezuela Red Book 1H 2019,” produced as G_000095737.

83. Attached as **Exhibit 81** is a true and correct copy of plaintiff's motion for summary judgment in lieu of complaint and supporting documents in *Dresser-Rand Comp. v. Petróleos De Venezuela, S.A. and PDVSA Petróleo SA*, 651190/2019 (S.Ct. NY) NYSCEF No. 3.

84. Attached as **Exhibit 82** is a true and correct copy of Petróleos De Venezuela, S.A. and subsidiaries' consolidated financial statements for the year ended December 31, 2016 with independent auditors' report, dated August 11, 2017 and produced as G_000119002.

85. Attached as **Exhibit 83** is a true and correct copy of Venezuela's form 10-K annual report for the fiscal year ended December 31, 2016, dated December 21, 2017 and produced as G_000118820.

86. Attached as **Exhibit 84** is a true and correct copy of the Supplemental Expert Report of Francisco Rodríguez, Ph.D. dated February 12, 2025 and revised on March 17, 2025 (HIGHLY CONFIDENTIAL).

87. Attached as **Exhibit 85** is a true and correct copy of the January 21, 2010, email from: C. Jorda, To: H. Medina; E Rincon, re: "Citgo," produced as PDVSA_0046851 (HIGHLY CONFIDENTIAL).

88. Attached as **Exhibit 86** is a true and correct copy of excerpts from the Final Award issued on May 27, 2019, in the case of *Surpass Commercial Corp. Ltd. v. Bariven S.A.*, under the International Chamber of Commerce (ICC) Case No. 22423/FS.

89. Attached as **Exhibit 87** is a true and correct copy of the University of Notre Dame case study by Lakshmi Iyer and Francisco Rodriguez: "Hyperinflation in Venezuela," dated March 9, 2021 and produced as G_000098137.

90. Attached as **Exhibit 88** is a true and correct copy of a letter November 1, 2019

letter from Servicios Halliburton de Venezuela, S.A., addressed to Petróleos de Venezuela, S.A. (PDVSA) and PDVSA Petróleo, S.A., produced as G_000307177 (CONFIDENTIAL).

91. Attached as **Exhibit 89** is a true and correct copy of a Central Bank of Venezuela spreadsheet containing yearly export figures in millions of U.S. dollars from 1997 to 2018, dated December 5, 2024 and produced as G_000117567.

92. Attached as **Exhibit 90** is a true and correct copy of a Central Bank of Venezuela document: “Notes on the Foreign Exchange Liquidation Process,” produced as G_000110238.

93. Attached as **Exhibit 91** is a true and correct copy of the Official Gazette of Venezuela No. 6.122 extraordinary, dated January 23, 2014 and produced as G_000325402.

94. Attached as **Exhibit 92** is a true and correct copy of Thomas Sargent, *The Ends of Four Big Inflations*, in Inflation: Causes and Effects, 41 (Robert Hall ed., 1982), produced as G_000330256.

95. Attached as **Exhibit 93** is a true and correct copy of excerpts from *Postconflict Economics in Sub-Saharan Africa: Lessons from the Democratic Republic of the Congo* (Jean A.P. Clement ed., International Monetary Fund 2004), produced as G_000329858.

96. Attached as **Exhibit 94** is a true and correct copy of excerpts from a policy paper issued by Oil for Venezuela: “Tackling Venezuela’s Humanitarian Crisis: Mobilizing Resources Through a Political Agreement,” dated April 2021.

97. Attached as **Exhibit 95** is a true and correct copy of the June 25, 2023 email from: C. Jorda, To: dgse50@yahoo.com; tyroneperdomo@synoil-chem.com, re: Internationalization and attachment, produced as PDVH_Girard Street_000109970 (CONFIDENTIAL).

98. Attached as **Exhibit 96** is a true and correct copy of the executed security

agreement among Citgo Holding and Deutsche Bank, dated February 12, 2015 and produced as PDVH_Girard Street_000058788 (CONFIDENTIAL).

99. Attached as **Exhibit 97** is a true and correct copy of the executed depositary agreement among Citgo Holding and Deutsche Bank, dated February 12, 2015 and produced as PDVH_Girard Street_000058884 (CONFIDENTIAL).

100. Attached as **Exhibit 98** is a true and correct copy of Petróleos De Venezuela, S.A. and subsidiaries' consolidated financial statements for the year ended December 31, 2015 with independent auditors' report, dated June 30, 2016 and produced as G_000107094.

101. Attached as **Exhibit 99** are true and correct copies of excerpts from Jack Schwager's deposition dated February 21, 2025.

102. Attached as **Exhibit 100** is a true and correct copy of the PDVSA 6.5% senior guaranteed note, series 2016E, dated June 29, 2016 and produced as G_000323677, filed as ECF No. 65-5 in *Girard Street Investment Holdings LLC v. Petróleos De Venezuela, S.A., et al.*, 1:23-cv-10772-JSR (SDNY) ("Girard Street Inv. Holdings").

103. Attached as **Exhibit 101** is a true and correct copy of PDVSA's Responses and Objections to Plaintiffs' First Set of Requests for Admissions, in Girard Street Inv. Holdings, dated February 24, 2025.

104. Attached as **Exhibit 102** is a true and correct copy of Petróleo's Responses and Objections to Plaintiffs' First Set of Requests for Admissions, in Girard Street Inv. Holdings, dated February 24, 2025.

105. Attached as **Exhibit 103** is a true and correct copy of the Debt Assumption and Novation Agreement between PDVSA, Petróleo, and Servicios Halliburton de Venezuela, S.A., dated June 29, 2016 and produced as G_000301043 (CONFIDENTIAL).

106. Attached as **Exhibit 104** is a true and correct copy of PDVSA's Responses and Objections to Plaintiffs' First Set of Requests for Admissions, in *G&A Strategic Invs.*, dated February 24, 2025.

107. Attached as **Exhibit 105** is a true and correct copy of Petróleo's Responses and Objections to Plaintiffs' First Set of Requests for Admissions, in *G&A Strategic Invs.*, dated February 24, 2025.

108. Attached as **Exhibit 106** is a true and correct copy of Citgo Holding Inc.'s Report for the Quarterly Period Ended March 31, 2015, dated May 12, 2015 and produced as PDVH_Girard Street_000011921 (CONFIDENTIAL).

109. Attached as **Exhibit 107** is a true and correct copy of a Notes Purchase Agreement among Schlumberger Venezuela S.A. and Schlumberger Finance B.V. with exhibits, dated July 20, 2017 and produced as G_000037499 (CONFIDENTIAL).

110. Attached as **Exhibit 108** is a true and correct copy of a letter from Norton Rose Fullbright US LLP to PDVSA re: Resale of Promissory Notes of Petroleos De Venezuela, S.A., dated August 16, 2017 and produced as G_000037284 (CONFIDENTIAL).

111. Attached as **Exhibit 109** is a true and correct copy of an LMA Trade Confirmation (Bank Debt) from Cowen and Company, LLC, dated October 18, 2018 and produced as G_000037513 (HIGHLY CONFIDENTIAL).

112. Attached as **Exhibit 110** is a true and correct copy of the October 29, 2018 letter from: D. Charney (Cowen and Company, LLC), to: E. Manrique (PDVSA); Schlumberger Finance B.V., re: Notice of Assignment and Appointment of Successor Administrative Agent, produced as G_000037620 (CONFIDENTIAL).

113. Attached as **Exhibit 111** is a true and correct copy of excerpts from James Taylor's personal deposition dated February 19, 2025 (HIGHLY CONFIDENTIAL).

114. Attached as **Exhibit 112** is a true and correct copy of excerpts from Matthew Maloney's deposition dated February 13, 2025 (HIGHLY CONFIDENTIAL).

115. Attached as **Exhibit 113** is a true and correct copy of the October 29, 2018 email from: D. Phillips, to: manriqueej@pdvsa.com; E. Hardell, re: Assignment of Payment through Debt Security Title, produced as G_000037751 (CONFIDENTIAL).

116. Attached as **Exhibit 114** is a true and correct copy of the October 29, 2018 letter from: D. Charney (Cowen and Company, LLC), to: E. Manrique (PDVSA); Schlumberger Finance B.V., re: Notice of Assignment and Appointment of Successor Administrative Agent, produced as G_000037752 (CONFIDENTIAL).

117. Attached as **Exhibit 115** is a true and correct copy of the January 23, 2015 email from: J. Hernandez to J. Pereira, re: CITGO, produced as PDVH_Girard Street_000076405. (HIGHLY CONFIDENTIAL).

118. Attached as **Exhibit 116** is a true and correct copy of the October 29, 2018 letter from Cowen to E. Manrique re: Notice of Assignment and Appointment of Successor Administrative Agent, produced as G_000037475 (CONFIDENTIAL).

119. Attached as **Exhibit 117** is a true and correct copy of the October 29, 2018 letter from: R. Koenigsberger, To: E. Manrique (PDVSA); Cowen and Company, LLC, re: Notice of Assignment and Appointment of Successor Administrative Agent, produced as G_000037484 (CONFIDENTIAL).

120. Attached as **Exhibit 118** is a true and correct copy of the October 29, 2018 email from D. Phillips to J. O'Melia; J. Taylor; J. Cox; M. Maloney; B. Seyfried; J. Ching; E. Cabo re: PDVSA Notes – Wire Out, produced as G_000038542 (HIGHLY CONFIDENTIAL).

121. Attached as **Exhibit 119** is a true and correct copy of the Pricing Letter from seller Cowen and Company, LLC, dated August 2, 2018 and produced as G_000063975 (HIGHLY CONFIDENTIAL).

122. Attached as **Exhibit 120** is a true and correct copy of the LMA Trade Confirmation (Bank Debt) from Schlumberger Finance B.V. to Cowen and Company, LLC, dated October 18, 2018 and produced as G_000037099 (CONFIDENTIAL).

123. Attached as **Exhibit 121** is a true and correct copy of the October 29, 2018 letter from: Altum Abogados S.C., to: PDVSA, re: Notification of assignment of Notes, according to the Note Agreement of May 4, 2017, produced as G_000302660 (CONFIDENTIAL).

124. Attached as **Exhibit 122** is a true and correct copy of the October 29, 2018 email from: A. Porras, to: manriqueej@pdvsa.com, re: Notice of Assignment of Promissory Notes, produced as G_000035573 (CONFIDENTIAL).

125. Attached as **Exhibit 123** is a true and correct copy of the October 30, 2018, email from: A. Porras, To: J. O'Melia; J. Ching, re: Notificacion de Cesion de Notas Promisorias, produced as G_000063999 (CONFIDENTIAL).

126. Attached as **Exhibit 124** is a true and correct copy of a photograph of the Venezuelan Mail Tracking No. 0106090780079, produced as G_000124575 (CONFIDENTIAL).

127. Attached as **Exhibit 125** is a true and correct copy of the October 29, 2018 email from: Microsoft Outlook, to: manriqueej@pdvsacom; bautepe@pdvsacom, re: Undeliverable: re: Promissory Notes Transfer Notice, produced as G_000037179 (CONFIDENTIAL).

128. Attached as **Exhibit 126** is a true and correct copy of the fax error report, dated October 29, 2018 and produced as G_000037705 (CONFIDENTIAL).

129. Attached as **Exhibit 127** is a true and correct copy of the November 28, 2023 letter from Cowen and Company, LLC to P. Tellechea, H. Segovia Marrero, and I. Corona, re: Ratification of Notice of Assignment and Appointment of Successor Administrative Agent, produced as G_000061981 (CONFIDENTIAL).

130. Attached as **Exhibit 128** is a true and correct copy of the U.S Department of the Treasury Venezuela Sanctions Regulations License No. VENEZUELA-EO13850-2020-370943-1, dated December 31, 2020 and produced as G_000075716 (CONFIDENTIAL).

131. Attached as **Exhibit 129** is a true and correct copy of PDVH's Consolidated Financial Statements as of December 31, 2015 and 2014 with independent auditors' report, dated July 15, 2016 and produced as PDVH_Girard Street_000001449 (CONFIDENTIAL).

132. Attached as **Exhibit 130** is a true and correct copy of the Note Purchase Agreement between Servicios Halliburton de Venezuela, S.A. and Girard Street Investment Holdings LLC, dated January 11, 2021 and produced as G_000037947 (HIGHLY CONFIDENTIAL).

133. Attached as **Exhibit 131** is a true and correct copy of the July 28, 2019 letter from L. Pacheco, to: J. Marquez re: Requested Information on PDVSA *Ad Hoc* Board achievements and work plan, produced as PDVSA_0039472 (HIGHLY CONFIDENTIAL).

134. Attached as **Exhibit 132** is a true and correct copy of the stipulation of facts regarding original noteholders executed in the above captioned cases, dated February 28, 2025.

135. Attached as **Exhibit 133** is a true and correct copy of the January 14, 2021, email from: D. Moses, to: J. Ching; R. Cloud; CC: R. Graham; R. Rosen; E. Cabo; C. Forbes-Cockell; J. O'Melia; M. Maloney, re: HAL Instructions, produced as G_000039154 (HIGHLY CONFIDENTIAL).

136. Attached as **Exhibit 134** is a true and correct copy of the January 14, 2021 letter from: Altum Abogados, to: PDVSA, re: Notification of Assignment of Note pursuant to the Note Agreement dated June 29, 2016, produced as G_000036659 (CONFIDENTIAL).

137. Attached as **Exhibit 135** is a true and correct copy of the January 14, 2021 email from: A. Porras to: R. Bolívar, A. M. España, and A. Rivas re: Notice of Assignment of Promissory Notes, produced as G_000036658 (CONFIDENTIAL).

138. Attached as **Exhibit 136** is a true and correct copy of the August 30, 2022 email from: M. Vallejo, to: GirardNotice, re: Girard Street Investment Holding LLC, produced as G_000036651 (CONFIDENTIAL).

139. Attached as **Exhibit 137** is a true and correct copy of the August 29, 2022 letter from: O. Cuevas to: Girard Street Investment Holdings LLC re: Waiver Request for Audited Financial Statements, produced as G_000036652 (CONFIDENTIAL).

140. Attached as **Exhibit 138** is a true and correct copy of the July 18, 2022 email from: I. Corona to: GirardNotice, re: Assignment of Note Agreement, produced as G_000036650 (CONFIDENTIAL).

141. Attached as **Exhibit 139** is a true and correct copy of the February 28, 2023 letter from: H. Marrero, to: Girard Street Investment Holdings LLC, re: Waiver Request Related to Note Agreement, produced as G_000301407 (CONFIDENTIAL).

142. Attached as **Exhibit 140** is a true and correct copy of the March 29, 2024 letter from: H. Marrero, to: Girard Street Investment Holdings LLC, re: Waiver Request Related to Note Agreement, produced as G_000128532 (CONFIDENTIAL).

143. Attached as **Exhibit 141** is a true and correct copy of the September 6, 2022 email from: J. O'Melia, to: M. Vallejo, re: Girard Street Investment Holding LLC, produced as G_000036649 (CONFIDENTIAL).

144. Attached as **Exhibit 142** is a true and correct copy of the November 10, 2017 letter from: Schlumberger Finance B.V., to: Petróleos de Venezuela, S.A., re: Payment of Interests – 6.50% Senior Guaranteed Notes, Series 2017D, produced as G_000073758 (HIGHLY CONFIDENTIAL).

145. Attached as **Exhibit 143** is a true and correct copy of the December 13, 2017 letter from: E. Hardell (Schlumberger Finance B.V.), to: E. Manrique (PDVSA), re: Payment of Interests – 6.50% Senior Guaranteed Notes, Series 2017D, produced as G_000072341 (CONFIDENTIAL).

146. Attached as **Exhibit 144** is a true and correct copy of PDV USA. Inc.'s FARA registration statement, filed December 31, 2020 and produced as G_000000534.

147. Attached as **Exhibit 145** is a true and correct copy of the August 14, 2017, letter from: L. Garcia (Schlumberger), to: E. Manrique (PDVSA), re: Payment of Interests - 6.5% Senior Guaranteed Notes, Series 2017D, produced as G_000129476 (CONFIDENTIAL).

148. Attached as **Exhibit 146** is a true and correct copy of the April 25, 2018 email from: M. Maloney to: M. Maloney re: PDVSA Prom Note – Halliburton, produced as G_000056935 (HIGHLY CONFIDENTIAL).

149. Attached as **Exhibit 147** is a true and correct copy of the April 17, 2018 letter from: Servicios Halliburton de Venezuela, S.A., to: PDVSA, Petróleos, re: 6.50% Senior Guaranteed Note, Series 2016E (Notice of Default), produced as G_000323758, filed as ECF No. 65-9 in Girard Street Inv. Holdings.

150. Attached as **Exhibit 148** is a true and correct copy of the August 6, 2018 letter from: Servicios Halliburton de Venezuela, S.A., to: PDVSA, Petróleos, re: 6.50% Senior Guaranteed Note, Series 2016E (Notice of Default), produced as G_000323493, filed as ECF No. 65-10 in Girard Street Inv. Holdings, dated September 30, 2024.

151. Attached as **Exhibit 149** is a true and correct copy of the May 14, 2019 letter from: Servicios Halliburton de Venezuela, S.A., to: PDVSA, Petróleo, re: 6.50% Senior Guaranteed Note, Series 2016E (Notice of Default), produced as G_000323600, filed as ECF No. 65-11 in Girard Street Inv. Holdings, dated September 30, 2024.

152. Attached as **Exhibit 150** is a true and correct copy of the December 4, 2019 letter from: Servicios Halliburton de Venezuela, S.A., to: PDVSA, Petróleo, re: 6.50% Senior Guaranteed Note, Series 2016E (Notice of Default), produced as G_000324513, filed as ECF No. 65-12 in Girard Street Inv. Holdings.

153. Attached as **Exhibit 151** is a true and correct copy of the May 19, 2020 letter from: Servicios Halliburton de Venezuela, S.A., to: PDVSA, Petróleo, re: 6.50% Senior Guaranteed Note, Series 2016E (Notice of Default), produced as G_000126095 (CONFIDENTIAL).

154. Attached as **Exhibit 152** is a true and correct copy of the November 7, 2022 email from: M. Maloney, to: R. Cloud, re: [EXTERNAL] ARG + VENZ, produced as G_000053715 (CONFIDENTIAL).

155. Attached as **Exhibit 153** is a true and correct copy of the March 5, 2020 email from: M. Maloney to: J. Griffin, re: Conference call, produced as G_000288109 (HIGHLY CONFIDENTIAL).

156. Attached as **Exhibit 154** is a true and correct copy of the December 1, 2020 email from: M. Maloney to: M. Christ re: PDVSA Prom Note L3 - 12.31.20.xlsx with excerpts of attached excel, produced as G_000291746 (CONFIDENTIAL/HIGHLY CONFIDENTIAL).

157. Attached as **Exhibit 155** is a true and correct copy of the December 9, 2021, email from: M. Maloney to: D. Jensen re: PNOTE L3, produced as G_000093618 (CONFIDENTIAL).

158. Attached as **Exhibit 156** is a true and correct copy of excerpts from the spreadsheet attached to the email that is Exhibit 155, containing valuations for the Schlumberger and Haliburton promissory notes and produced as G_000093619 (HIGHLY CONFIDENTIAL).

159. Attached as **Exhibit 157** is a true and correct copy of excerpts from the spreadsheet containing information on promissory note valuation, dated December 31, 2019 and produced as G_000049925 (HIGHLY CONFIDENTIAL).

160. Attached as **Exhibit 158** is a true and correct copy of excerpts from a spreadsheet with Girard Street's damages calculations produced as G_000325365 (HIGHLY CONFIDENTIAL).

161. Attached as **Exhibit 159** is a true and correct copy of excerpts from a spreadsheet with G&A's damages calculations produced as G_000325366 (HIGHLY CONFIDENTIAL).

162. Attached as **Exhibit 160** is a true and correct copy of Hugo Chavez Frias, *Alternative Bolivarian Agenda*, (Francisco Avila ed., 2014), produced as G_000096347.

163. Attached as **Exhibit 161** is a true and correct copy of the Venezuelan Constitution, published in the Venezuelan Official Gazette Extraordinary No. 5,908, dated February 19, 2009, filed as ECF No. 128-5 in MUFG Union Bank and produced as G_000015414.

164. Attached as **Exhibit 162** is a true and correct copy of excerpts from Transparency Venezuela's study: "The Downfall of 'The Industry': Looting, Production Decline and the End of Meritocracy," dated 2018 and produced as G_000097136.

165. Attached as **Exhibit 163** is a true and correct copy of excerpts from the presentation from a Citgo and PDVSA Board of Directors meeting: "Operational and Financial Results 2015, Medium Term Plan & Budget 2016," dated March 17, 2016 and produced as PDVH_Girard Street_000014196 (CONFIDENTIAL).

166. Attached as **Exhibit 164** is a true and correct copy of excerpts from Carlos Jordá's deposition dated February 24, 2025.

167. Attached as **Exhibit 165** is a true and correct copy of excerpts from Human Rights Watch's article, "A Decade Under Chávez: Political Intolerance and Lost Opportunities for Advancing Human Rights in Venezuela," dated September 2008 and produced as G_000096842.

168. Attached as **Exhibit 166** is a true and correct copy of excerpts from Horacio Francisco Medina Herrera's deposition dated February 21, 2025.

169. Attached as **Exhibit 167** is a true and correct copy of PDVSA's webpage: "Speech by the Minister and President of PDVSA Before the National Assembly," dated May 25, 2005 and produced as G_000039313.

170. Attached as **Exhibit 168** is a true and correct copy of Phillips 66's "Execution: 2014 Annual Report," produced as G_000117395.

171. Attached as **Exhibit 169** is a true and correct copy of the Venezuela Analysis article: "Venezuela Sells Citgo's Stake in Lyondell Refinery," dated August 16, 2006 and produced as G_000030871.

172. Attached as **Exhibit 170** is a true and correct copy of the July 26, 2020 email from: C. Jorda, To: L. Palacios, M. Ripanti, re: The CITGO Story, produced as PDVH_Girard Street_000017170 (CONFIDENTIAL).

173. Attached as **Exhibit 171** is a true and correct copy of the NPR article: "Venezuela's Oil Deal for U.S. Poor Draws Heat," dated January 10, 2006 and produced as G_000095816.

174. Attached as **Exhibit 172** is a true and correct copy of the Citgo news release: "Ninth Annual CITGO-Venezuela Heating Oil Program to Warm Thousands of Families During Cold Winter Months," dated February 5, 2014 and produced as G_000121174.

175. Attached as **Exhibit 173** is a true and correct copy of the Reuters article: “Venezuela brings free heating oil to poor in NY,” dated December 14, 2007.

176. Attached as **Exhibit 174** is a true and correct copy of the BBC world news article: “Chavez Intensifies Nationalization Process,” dated May 22, 2009 and produced as G_000098019.

177. Attached as **Exhibit 175** is a true and correct copy of the Vlex page for Venezuela Decree No. 5,200: “Decree with Rank, Value, and Force of Law on the Migration to Joint Ventures of the Association Agreements of the Orinoco Oil Belt, as well as the Risk Exploration and Profit Sharing Agreements,” dated February 26, 2007 and produced as G_000110117.

178. Attached as **Exhibit 176** is a true and correct copy of excerpts from the award for ICSID Case No. ARB/12/23, *Tenaris S.A., et al., v. The Bolivarian Republic of Venezuela*, dated December 12, 2016 and produced as G_000317730.

179. Attached as **Exhibit 177** is a true and correct copy of excerpts from the award for ICSID Case No. ARB(AF)/11/2, *Crystalllex International Corporation v. Bolivarian Republic of Venezuela*, dated April 4, 2016, filed as ECF No. 171-68 in Crystalllex and produced as G_000023902.

180. Attached as **Exhibit 178** is a true and correct copy of a New York Times article: “Venezuela Vows to Reject Arbitration in Exxon Case,” dated January 8, 2012 and produced as G_000319843.

181. Attached as **Exhibit 179** is a true and correct copy of the ICSID news release: “Venezuela Submits a Notice under Article 71 of the ICSID Convention,” dated January 26, 2012 and produced as G_000095726.

182. Attached as **Exhibit 180** is a true and correct copy of PDVH’s Answer and Defenses to Plaintiffs’ Amended Complaint, filed as ECF No. 132 in G&A Strategic Invs., dated March 10, 2025.

183. Attached as **Exhibit 181** is a true and correct copy of PDVH’s Answer and Defenses to Plaintiffs’ Consolidated Amended Complaint, filed as ECF No. 122 in *Girard Street Investment Holdings LLC v. PDV Holding, Inc.*, 24-cv-04448-JSR (SDNY) (“**Girard Street – PDVH**”), dated March 10, 2025.

184. Attached as **Exhibit 182** is a true and correct copy of Plaintiffs’ Response to Defendants’ Statement of Undisputed Material Facts in Support of Defendants’ Cross-Motion for Summary Judgment, filed as ECF No. 166 in MUFG Union Bank, dated July 6, 2020 and produced as G_000121954.

185. Attached as **Exhibit 183** is a true and correct copy of the Official Gazette of Venezuela No. 6118 Extraordinary, dated December 4, 2013 and produced as G_000003276.

186. Attached as **Exhibit 184** is a true and correct copy of excerpts from PDVSA’s “Strategic Socialist Plan 2016-2026,” produced as G_000003408.

187. Attached as **Exhibit 185** is a true and correct copy of the El Impulso article: “PDVSA Petróleos de Venezuela: maintains full ownership of Citgo,” dated December 23, 2016 and produced as G_000121162.

188. Attached as **Exhibit 186** is a true and correct copy of the Official Gazette of Venezuela No. 41.138: “Presidency of Venezuela,” dated April 26, 2017 and produced as G_000111590.

189. Attached as **Exhibit 187** is a true and correct copy of the El Pais article: “Maduro Appoints Chavez’s Cousin President of PDVSA’s US Affiliate,” dated November 23, 2017 and produced as G_000096772.

190. Attached as **Exhibit 188** is a true and correct copy of Official Gazette of Venezuela No. 41.284, dated November 22, 2017 and produced as PDVH_Girard Street_000036972.

191. Attached as **Exhibit 189** is a true and correct copy of Valero Energy Corporation’s Form 10-K annual report for the fiscal year ended December 31, 2015 and produced as G_000101922.

192. Attached as **Exhibit 190** is a true and correct copy of PDVH’s Objections and Response to Plaintiff’s Second Set of Interrogatories, served in Girard Street – PDVH, dated January 23, 2025.

193. Attached as **Exhibit 191** is a true and correct copy of the Siemens news release: “Siemens announces agreement to acquire Dresser-Rand,” dated September 22, 2014.

194. Attached as **Exhibit 192** is a true and correct copy of PDVSA Minutes of the Ordinary Meeting of the Ad Hoc Management Board, dated June 14, 2021 and produced PDVSA_0000216 (CONFIDENTIAL).

195. Attached as **Exhibit 193** is a true and correct copy of Marathon Petroleum Corporation’s 2015 annual report, produced as G_000102260.

196. Attached as **Exhibit 194** is a true and correct copy of the September 1, 2018 letter from: Asdrúbal Chávez, to: M. Quevedo, regarding the Citgo and Petroleo “crude oil for products” program additional funding with attached documents, produced as PDVH_Girard Street_000121859 (HIGHLY CONFIDENTIAL).

197. Attached as **Exhibit 195** is a true and correct copy of Citgo's employee webpage for Carlos Jordá.

198. **Exhibit 196** is intentionally omitted.

199. Attached as **Exhibit 197** is a true and correct copy of PDVSA Minutes of the Ad-Hoc Management Board Meeting, dated October 26, 2020 and produced as PDVSA_0000478 (CONFIDENTIAL).

200. Attached as **Exhibit 198** is a true and correct copy of the December 16, 2020 email from: L. Pacheco, to: H. Medina, R. Prada, C. Balza, J. Cardenas, C. Martinez, S. Antunez, J. Linares, and. J. Pocaterra, re: Memorandum Requesting Approval - Appointment of Andrés Yrigoyen Luna, produced as PDVSA_0000473 (CONFIDENTIAL).

201. Attached as **Exhibit 199** is a true and correct copy of Argus news article: "Venezuela prepares olive branch as US reviews sanctions," dated November 2, 2021 and produced as G_000121232.

202. Attached as **Exhibit 200** is a true and correct copy of Reuters' press release: "Two PDVSA executives arrested by Venezuelan's intelligence agents: sources," dated February 28, 2020.

203. Attached as **Exhibit 201** is a true and correct copy of Bloomberg article: "Venezuela's Oil Minister and State Oil Firm Chief to Switch Roles, Maduro Says", dated August 24, 2017, and produced as G_000121338.

204. Attached as **Exhibit 202** is a true and correct copy of the chart titled: "VZ Oil Exports, Average VZ Oil Basket Prices, and Relevant VZ, PDVH and Subsidiary Events."

205. Attached as **Exhibit 203** is a true and correct copy of the Citgo Company Profile presentation, dated June 2021 and produced as PDVH_Girard Street_000088850 (CONFIDENTIAL).

206. Attached as **Exhibit 204** is a true and correct copy of the Entities of PDV Holding—Capital Structure presentation, produced as PDVH_Girard Street_000008587 (HIGHLY CONFIDENTIAL).

207. Attached as **Exhibit 205** is a true and correct copy of PDV USA, Inc.’s Exhibit B to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as Amended, dated April 30, 2021.

208. Attached as **Exhibit 206** is a true and correct copy of the April 30, 2018 email from Curis Rowe to Gina Coon that attached the crude supply agreement “effective 4_1_16”, contract number 37000177, between PPSA and Citgo for the period of April 1, 2016 to April 30, 2021, produced as PDVH_Girard Street_000094453 (CONFIDENTIAL).

209. Attached as **Exhibit 207** is a true and correct copy of Citgo 2015 finance profile, produced as PDVH_Girard Street_000131365 (CONFIDENTIAL).

210. Attached as **Exhibit 208** is a true and correct copy of excerpts from Robert Shoemaker’s 30(b)(6) deposition dated February 26, 2025 (CONFIDENTIAL).

211. Attached as **Exhibit 209** is a true and correct copy of draft meeting minutes for a meeting of the PDVSA Ad-Hoc Management Board, dated December 17, 2020 and produced as PDVSA_0000474 (CONFIDENTIAL).

212. Attached as **Exhibit 210** is a true and correct copy of the PDV Holding and Subsidiaries, Historical Dividends 1986-2014 (May) presentation, produced as PDVH_Girard Street_000017271 (CONFIDENTIAL).

213. Attached as **Exhibit 211** is a true and correct copy of Citgo Forecast 2015-2020 chart, produced as PDVH_Girard Street_000017094 (CONFIDENTIAL).

214. Attached as **Exhibit 212** is a true and correct copy of Citgo Projection Model (2014-2020) chart, produced as PDVH_Girard Street_000017311 (HIGHLY CONFIDENTIAL).

215. Attached as **Exhibit 213** is a true and correct copy of Citgo's unanimous written consent of the board of directors regarding 2014 operating and capital budget, dated April 15, 2014 and produced as PDVH_Girard Street_00003094 (HIGHLY CONFIDENTIAL).

216. Attached as **Exhibit 214** is a true and correct copy of PDVSA Ad Hoc Management Board's presentation of results 2019-2020, produced as PDVSA_0000557.

217. Attached as **Exhibit 215** is a true and correct copy of a May 30, 2023 Email from: C. Jorda, To: S. Menson re: "presentations" with attached "Financial Performance v.4.17.2023 v3.pptx", produced as PDVH_Girard Street_00008634 (CONFIDENTIAL).

218. Attached as **Exhibit 216** is a true and correct copy of Reuters article "Refiner Citgo to pay \$461 mln dividends to Venezuela's PDVSA," dated May 16, 2013.

219. Attached as **Exhibit 217** is a true and correct copy of Citgo's Report for the Fiscal Year ended December 31, 2015, produced as PDVH_Girard Street_000025221 (HIGHLY CONFIDENTIAL).

220. Attached as **Exhibit 218** is a true and correct copy of Citgo's Offering Memorandum for \$650,000,000 aggregate principal amount of 6.25% senior secure notes due 2022, produced as PDVH_Girard Street_000117809 (CONFIDENTIAL).

221. Attached as **Exhibit 219** is a true and correct copy of Indenture between Citgo and U.S. Bank National Association, dated July 29, 2014 and produced as PDVH_Girard Street_000118810 (CONFIDENTIAL).

222. Attached as **Exhibit 220** is a true and correct copy of Credit Agreement among Citgo as Borrower and various banks, dated July 29, 2014 and produced as PDVH_Girard Street_000118112 (CONFIDENTIAL).

223. Attached as **Exhibit 221** is a true and correct copy of the Services Agreement between PDV Chalmette, LLC, PDVSA, and Petróleos, dated August 30, 2022 and produced as PDVH_Girard Street_000039004 (HIGHLY CONFIDENTIAL).

224. Attached as **Exhibit 222** is a true and correct copy of a services agreement, dated September 11, 2023 and produced as PDVH_Girard Street_000007560 (CONFIDENTIAL).

225. Attached as **Exhibit 223** is a true and correct copy of Citgo's Offering Memorandum for \$1,500,000,000 aggregated principal amount of 10.75% senior secured notes due 2020, produced as PDVH_Girard Street_000119380 (CONFIDENTIAL).

226. Attached as **Exhibit 224** is a true and correct copy of PDV Holding, Inc. Consolidated Financial Statements as of December 31, 2015 and 2014, and for Each of the Years in the Two-Year Period Ended December 31, 2015, and Independent Auditors' Report, dated July 15, 2016, and produced as PDVH_Girard Street_000021960 (CONFIDENTIAL).

227. Attached as **Exhibit 225** is a true and correct copy of Citgo's 2020 Performance and Q1 2021 Update, dated June 15, 2021 and produced as PDVH_Girard Street_000008726 (HIGHLY CONFIDENTIAL).

228. Attached as **Exhibit 226** is a true and correct copy of Argus Media article “PdV weighing offers to sell Citgo,” dated July 24, 2014 and produced as G_000319376.

229. Attached as **Exhibit 227** is a true and correct copy of Citgo’s Finance Department Meeting - CITGO Holding Debt Offering, dated February 18, 2015 and produced as PDVH_Girard Street_000008095 (CONFIDENTIAL).

230. Attached as **Exhibit 228** is a true and correct copy of PDVSA S.E.C. Form T-3 with the proposed public offering date of September 16, 2026, produced as G_000032930.

231. Attached as **Exhibit 229** is a true and correct copy of December 12, 2024 Expert Report of Jonathan R. Macey (CONFIDENTIAL).

232. Attached as **Exhibit 230** is a true and correct copy of Citgo’s Summary of Activities, dated December 31, 2019 and produced as G_000001542.

233. Attached as **Exhibit 231** is a true and correct copy of a written consent of the stockholders of PDVH, dated January 21, 2015 and produced as PDVH_Girard Street_000000074 (CONFIDENTIAL).

234. Attached as **Exhibit 232** is a true and correct copy of an Unanimous Written Consent of the Board of Directors of PDVH, dated January 21, 2015 and produced as PDVH_Girard Street_000000046 (CONFIDENTIAL).

235. Attached as **Exhibit 233** is a true and correct copy of the memorandum of law in support of plaintiff’s motion for summary judgment in lieu of complaint, filed in *Red Tree Investments, LLC v. Petróleos de Venezuela, SA*, Index No. 651005/2019 (S.Ct. NY) at NYSCEF Doc. No. 11, dated February 15, 2019.

236. Attached as **Exhibit 234** is a true and correct copy of a document with track changes titled “Script for Pereira Presentation – Department Staff Meeting”, dated February 18, 2015 and produced as PDVH_Girard Street_000011026 (CONFIDENTIAL).

237. Attached as **Exhibit 235** is a true and correct copy of document with track changes titled “Script for Pereira Presentation – Department Staff Meeting,” dated February 18, 2015 and produced as PDVH_Girard Street_000008129 (CONFIDENTIAL).

238. Attached as **Exhibit 236** is a true and correct copy of January 2015 presentation titled “CITGO Holding, Inc. Public Lenders Presentation”, and produced as PDVH_Girard Street_000012065 (CONFIDENTIAL).

239. Attached as **Exhibit 237** is a true and correct copy of January 2015, presentation titled “CITGO Holding, Inc. Public Lenders Presentation”, and produced as PDVH_Girard Street_000012120 (CONFIDENTIAL).

240. Attached as **Exhibit 238** is a true and correct copy of January 2015 presentation titled “CITGO Holding, Inc. Public Lenders Presentation”, and produced as PDVH_Girard Street_000018676 (CONFIDENTIAL).

241. Attached as **Exhibit 239** is a true and correct copy of January 2015 presentation titled “CITGO Holding, Inc. Public Lenders Presentation”, and produced as PDVH_Girard Street_000009990 (CONFIDENTIAL).

242. Attached as **Exhibit 240** is a true and correct copy of of License Extension issued to PDVH by Department of the Treasury, produced as PDVSA_0003465 (HIGHLY CONFIDENTIAL).

243. Attached as **Exhibit 241** is a true and correct copy of July 2015 Draft Presentation to CITGO BOD, Proposal To Support PDVSA Dilution Strategy for The Production of Extra-Heavy Crude From The Orinoco Belt, produced as PDVH_Girard Street_000010060 (HIGHLY CONFIDENTIAL).

244. Attached as **Exhibit 242** is a true and correct copy of July 23, 2015, email from: J. Carroll to: J. DiCarlo; D. Treas; S. Pugh; A. Goleman; P. Easter; B. Parks; R. Reyes; J. Conway; K. O'Brien; G. Coon; D. Weaver; J. Butts; B. Shoemaker; A. Courter, re: "LDC SAP System Verification" referencing attachment titled "LDC Proposal to CITGO BOD_7_16_15_v6 translate (2).pptx," and produced as PDVH_Girard Street_000013024 (CONFIDENTIAL).

245. Attached as **Exhibit 243** is a true and correct copy of a presentation titled "Update on the progress of the project to support PDVSA Petróleo in its dilution strategy for the production of extraheavy crude oil from the Orinoco Oil Belt (OOB), Draft Presentation to the CITGO/PDVSA BOD", dated July 22, 2015 and produced as PDVH_Girard Street_000013026 (HIGHLY CONFIDENTIAL).

246. Attached as **Exhibit 244** is a true and correct copy of the March 27, 2015 Note Agreement among PDVSA, Petróleos, and General Electric Capital Corporation, filed in *Red Tree Investments, LLC v. Petróleos de Venezuela, SA*, Index No. 651005/2019 (S.Ct. NY) at NYSCEF Doc. No. 4, dated February 15, 2019.

247. Attached as **Exhibit 245** is a true and correct copy of the official Gazette of Venezuela No. 39.681, dated May 25, 2011 and produced as PDVH_Girard Street_000036889.

248. Attached as **Exhibit 246** is a true and correct copy of October 30, 2015 email from: C. Rowe, To: R. Shoemaker, re: “Buenos Dias”, produced as PDVH_Girard Street_000016769 (CONFIDENTIAL).

249. Attached as **Exhibit 247** is a true and correct copy of PDVSA’s Responses to Plaintiffs Girard Street and G&A’s 30(b)(6) Notice in Case No. 24-cv-04448-JSR (Consolidated with Case No. 1:23-cv-10766-JSR and Case No. 1:23-cv-10772-JSR), served on February 11, 2025.

250. Attached as **Exhibit 248** is a true and correct copy of Petróleos De Venezuela, S.A.’S and PDVSA Petróleo, S.A.’S Answer and Affirmative Defenses to Plaintiff’s Consolidated Amended Complaint, filed on October 23, 2024 as ECF No. 79-0 in Girard Street Inv. Holdings.

251. Attached as **Exhibit 249** is a true and correct copy of Petróleos De Venezuela, S.A.’S and PDVSA Petróleo, S.A.’S Objections and Responses to Plaintiff’s Second Set of Requests for Admissions in Girard Street Inv. Holdings, served on February 24, 2025.

252. Attached as **Exhibit 250** is a true and correct copy of Citgo’s Credit Agreement, dated February 12, 2015 and produced as PDVH_Girard Street_000118558 (CONFIDENTIAL).

253. Attached as **Exhibit 251** is a true and correct copy of Citgo’s Intercreditor and Collateral Agency Agreement, dated February 12, 2015 and produced as PDVH_Girard Street_000058837 (CONFIDENTIAL).

254. Attached as **Exhibit 252** is a true and correct copy of an Indenture dated February 12, 2015 and produced as PDVH_Girard Street_000032845 (CONFIDENTIAL).

255. Attached as **Exhibit 253** is a true and correct copy of September 16, 2016, Offering Circular PDVSA “Petróleos de Venezuela, S.A. Offers to Exchange,” produced as G_000108272.

256. Attached as **Exhibit 254** is a true and correct copy of Citgo’s Report for the Fiscal Year Ended December 31, 2016, produced as PDVH_Girard Street_000009637 (CONFIDENTIAL).

257. Attached as **Exhibit 255** is a true and correct copy of a Unanimous Written Consent of the Board of Directors of PDV Holding, Inc., dated of February 11, 2015 and produced as PDVH_Girard Street_000000204 (CONFIDENTIAL).

258. Attached as **Exhibit 256** is a true and correct copy of January 28, 2015 email from: G. Coon, To: R. Lopez, J. Pereira, re: “bank flow – options”, with attachment titled “Standard flow of Dividend- Citgo to PDVSA”, produced as PDVH_Girard Street_000011110 (CONFIDENTIAL).

259. Attached as **Exhibit 257** is a true and correct copy of CITGO’s Report for the Fiscal Year Ended December 31, 2015, produced as PDVH_Girard Street_000025107 (HIGHLY CONFIDENTIAL).

260. Attached as **Exhibit 258** is a true and correct copy of a presentation titled “Evolution of CITGO and Description of its Assets,” produced as PDVH_Girard Street_000017765 (HIGHLY CONFIDENTIAL).

261. Attached as **Exhibit 259** is a true and correct copy of Citgo’s Report for the Fiscal Year Ended December 31, 2016, produced as PDVH_Girard Street_000025643 (HIGHLY CONFIDENTIAL).

262. Attached as **Exhibit 260** is a true and correct copy of Citgo's preliminary offering memorandum for \$1,500,000,000, dated January 28, 2015 and produced as G_000002137.

263. Attached as **Exhibit 261** is a true and correct copy of January 7, 2016 email from: G. Coon To: B. Shoemaker; C. Rowe; D. Weaver; J. Butts; R. Lopez, re: "Discuss 2015 Results and 2016 Work Plan", produced as PDVH_Girard Street_000014190 (CONFIDENTIAL).

264. Attached as **Exhibit 262** is a true and correct copy of a presentation titled "2015 Year-in-Review & 2016 Work Plan", produced as PDVH_Girard Street_000014192 (CONFIDENTIAL).

265. Attached as **Exhibit 263** is a true and correct copy of a news article titled "Fury among Citgo executives about Aruba deal," dated May 19, 2016 and produced as G_000030846.

266. Attached as **Exhibit 264** is a true and correct copy of the 2011-2015 International Reserves and Reference Exchange Rates chart.

267. Attached as **Exhibit 265** is a true and correct copy of a presentation titled "Operational and Financial Results 2015, Medium Term Plan & Budget 2016", dated March 17, 2016 and produced as PDVH_Girard Street_000013389 (CONFIDENTIAL).

268. Attached as **Exhibit 266** is a true and correct copy of news alert titled "PDVSA Announces Settlement of the Exchange Offers of its Outstanding 5.250% Senior Notes due 2017 and 8.50% Senior Notes due 2017 for New 8.50% Senior Secured Notes due 2020", dated October 28, 2016.

269. Attached as **Exhibit 267** is a true and correct copy of September 1, 2016 email from: G. Menendez, To: E. Herrera, M. Rodriguez, CC: R. Bolivar, D. del-Castillo-Negrete, J. Molina, M. Cummings, C. Marcase, re: “Modelo actualizado,” produced as UBS0000072 (HIGHLY CONFIDENTIAL).

270. Attached as **Exhibit 268** is a true and correct copy of Andres Rojas Jimenez’ article titled “Citgo’s dividends have been to pay the debt contracted by the last administration,” dated May 27, 2024 and produced as G_000039253.

271. Attached as **Exhibit 269** is a true and correct copy of a transcript of interview given by Horacio Medina, produced as PDVH_Girard Street_000140601 (CONFIDENTIAL).

272. Attached as **Exhibit 270** is a true and correct copy of January 29, 2025 Expert Report of Jack Schwager (HIGHLY CONFIDENTIAL).

273. Attached as **Exhibit 271** is a true and correct copy of National Assembly of the Bolivian Republic of Venezuela’s Agreement Authorizing the Appointment to Hold the Office of the Intervention Body Called “Ad-Hoc Administrative Board”, produced as PDVSA_0003286.

274. Attached as **Exhibit 272** is a true and correct copy of Klein/Johnson Group LLC’s Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended for 6-month period ending November 30, 2023, produced as G_000000296.

275. Attached as **Exhibit 273** is a true and correct copy of the License Extension issued to PDVH by the Department of the Treasury, produced as PDVH_Girard Street_000031939 (HIGHLY CONFIDENTIAL).

276. Attached as **Exhibit 274** is a true and correct copy of November 1, 2015 email from B. Shoemaker to C. Rowe re: “Buenos dias”, produced as PDVH_Girard Street_000008022 (CONFIDENTIAL).

277. Attached as **Exhibit 275** is a true and correct copy of May 2, 2017 email from: B. Shoemaker, To: C. Rowe; J. Chang; G. Hilman; S. McNabb, re: “RE: Pdvs request”, produced as PDVH_Girard Street_000007989 (CONFIDENTIAL).

278. Attached as **Exhibit 276** is a true and correct copy of December 2017 Citgo Board Presentation, produced as PDVH_Girard Street_000094536 (CONFIDENTIAL).

279. Attached as **Exhibit 277** is a true and correct copy of a letter from PDVSA Petroleo and Citgo to F. Khazal, dated March 22, 2016 and produced as PDVH_Girard Street_000046954 (CONFIDENTIAL).

280. Attached as **Exhibit 278** is a true and correct copy of March 23, 2016 email from: J. Bednar, To: J. Okwara, re: [REDACTED]
[REDACTED]
[REDACTED]

281. Attached as **Exhibit 279** is a true and correct copy of July 12, 2016 email from: J. Pereira, To: N. Martinez; P. Blanco, re: “Pdvs bond exchange potential transaction”, produced as PDVH_Girard Street_000008548 (CONFIDENTIAL).

282. Attached as **Exhibit 280** is a true and correct copy of an Action by Unanimous Written Consent of the Board of Directors of PDVH Holding, Inc., dated November 30, 2016, and produced as PDVH_Girard Street_000094719 (HIGHLY CONFIDENTIAL).

283. Attached as **Exhibit 281** is a true and correct copy of the Runrun news article: “Citgo is indebted to grant dividends to Pdvsa,” dated July 2014 and produced as G_000039228.

284. Attached as **Exhibit 282** is a true and correct copy of PDVSA’s Ad-Hoc Management Board Meeting Minutes, dated April 6, 2020 and produced as PDVH_Girard Street_000008887 (CONFIDENTIAL).

285. Attached as **Exhibit 283** is a true and correct copy of October 28, 2016 Pledge and Security Agreement among PDVH, Petróleos, PDVSA, Glas Americas LLC and MUFG Union Bank, N.A., produced as PDVSA_0034161 (CONFIDENTIAL).

286. Attached as **Exhibit 284** is a true and correct copy of excerpts from Fernando Vera 30(b)(6) deposition dated February 20, 2025.

287. Attached as **Exhibit 285** is a true and correct copy of Agreement for the Sale and Purchase of the Ownership Interests in Chalmette Refining, L.L.C., dated June 17, 2015 and produced as PDVH_Girard Street_000020490 (CONFIDENTIAL).

288. Attached as **Exhibit 286** is a true and correct copy of Pledge and Security Agreement, dated November 30, 2016 among PDVH, PDVSA, Petróleo and Rosneft Trading, S.A., produced as PDVH_Girard Street_000048691 (CONFIDENTIAL).

289. Attached as **Exhibit 287** is a true and correct copy of a document titled “Q3 2018-Backup Information- Possible Questions and Answers”, produced as PDVH_Girard Street_000131866 (CONFIDENTIAL).

290. Attached as **Exhibit 288** is a true and correct copy of December 2, 2016, email from: A. Rivas, To: mmarti5@citgo.com; jbednar@citgo.com; and jchien@citgo.com, re: “PDV Holding – Resolution”, produced as PDVH_Girard Street_000048688 (CONFIDENTIAL).

291. Attached as **Exhibit 289** is a true and correct copy of January 4, 2017 email From: J. Okwara To: F. Proust; J. Pereira; R. Lopez; J. Bednar, re: “PDVSA transaction with Rosneft”, produced as PDVH_Girard Street_000094716 (HIGHLY CONFIDENTIAL).

292. Attached as **Exhibit 290** is a true and correct copy of November 30, 2016, Pledge and Security Agreement, produced as PDVSA_0011024 (CONFIDENTIAL).

293. Attached as **Exhibit 291** is a true and correct copy of Petroleos De Venezuela, S.A. and Subsidiaries (PDVSA) Consolidated Financial Statements for December 31, 2016, produced as G_000000324.

294. Attached as **Exhibit 292** is a true and correct copy of excerpts from Julian Cardenas’ 30(b)(6) deposition dated February 26, 2025 (HIGHLY CONFIDENTIAL).

295. Attached as **Exhibit 293** is a true and correct copy of PDV Holding Inc.’s Waiver of Notice and Unanimous Written Consent of the Board of Directors in Lieu of a Special Meeting, dated November 23, 2020 and produced as PDVH_Girard Street_000000801 (CONFIDENTIAL).

296. Attached as **Exhibit 294** is a true and correct copy of Executive Order 13808 of August 24, 2017, 82 Fed. Reg. 41156 (Aug. 29, 2017), produced as G_000039377.

297. Attached as **Exhibit 295** is a true and correct copy of U.S. Department of the Treasury press release titled “Treasury Sanctions 13 Current and Former Senior Officials of the Government of Venezuela”, dated July 26, 2017 and produced as G_000121512.

298. Attached as **Exhibit 296** is a true and correct copy of Complaint for Declaratory and Injunctive Relief in *Petroleos De Venezuela, S.A. v. MUFG Union Bank, N.A.*, Case No. 19-cv-10023 (S.D.N.Y. Oct. 29, 2019), produced as G_000011454.

299. Attached as **Exhibit 297** is a true and correct copy of the National Assembly of the Bolivarian Republic of Venezuela’s Agreement that Reiterates the Invalidity of the 2020 PDVSA Bond, dated May 26, 2016 and produced as G_000111786.

300. Attached as **Exhibit 298** is a true and correct copy of excerpts from Luisa Palacios’ deposition dated February 10, 2025 (HIGHLY CONFIDENTIAL).

301. Attached as **Exhibit 299** is a true and correct copy of the “Non-Cash Dividend - Rolling Quarterly Summary” chart, produced as PDVH_Girard Street_000021297 (HIGHLY CONFIDENTIAL).

302. Attached as **Exhibit 300** is a true and correct copy of a presentation titled “Business Management Support PDVSA 2016 (actual) – 2017 (projected)”, bearing Citgo and PDVSA’s logos and produced as PDVH_Girard Street_000046102 (HIGHLY CONFIDENTIAL).

303. Attached as **Exhibit 301** is a true and correct copy of a May 4, 2016 email from Curits Rowe to Carlos Perales, with a copy to Jose Pereira, John Butts, and Robert Shoemaker, regarding “RE: [EXT] PDVHOLDING Report for the Period Ended December 31, 2015,” produced as PDVH_Girard Street_000014194 (CONFIDENTIAL).

304. Attached as **Exhibit 302** is a true and correct copy of a March 10, 2016 Letter Agreement between PDVSA and Citgo, signed by Rafael Rodriguez and directed to Jose Pereira, Jeff Bednar, and Richard Lopez, produced as PDVH_Girard Street_000120929 (HIGHLY CONFIDENTIAL).

305. Attached as **Exhibit 303** is a true and correct copy of Defendants Petroleos de Venezuela S.A.’s and PDVSA Petroleo, S.A.’s Objections and Responses to Plaintiffs’ Second Set of Requests for Admissions in *G&A Strategic Invs.* dated February 24, 2025.

306. Attached as **Exhibit 304** is a true and correct copy of a March 8, 2017 email from Robert Shoemaker to Stephen McNabb and Daniela Cooz and attached “backup slide” related to shareholder procurement, as well as excerpts of a spreadsheet with the underlying data for that slide, including entries related to vendor orders, invoices, and payments to Curtis Mallet Prevost Colt, produced as PDVH_Girard Street_000126866.

307. Attached as **Exhibit 305** is a true and correct copy of the Final Audit Report of PDV USA and PDVH Transactions dated February 27, 2020 and numbered 2018-GP-001 produced as PDVH_Girard Street_000141033 (CONFIDENTIAL).

308. Attached as **Exhibit 306** is a true and correct copy of a Form 20-F filed with the U.S. Securities and Exchange Commission by Eni SpA 20-F for the fiscal year ended December 31, 2017, retrieved from <https://www.sec.gov/Archives/edgar/data/1002242/000117494718000586/tv485407-20f.htm>.

309. Attached as **Exhibit 307** is a true and correct copy of a January 11, 2017 email from Gina Coon to Stephen McNabb and Jocelyn Sanchez with attachment “201612_Board Slide Update – Significant Events – Support Provided to PDVSA.pptx”, and excerpts of a spreadsheet with underlying data for the presentation, including payments made by Citgo for

special procurement, LDC, and other commercial activities during 2012 through 2016, produced as PDVH_Girard Street_000019801, 19802 (CONFIDENTIAL) and 19805 (HIGHLY CONFIDENTIAL).

310. Attached as **Exhibit 308** is a true and correct copy of a spreadsheet with accounting data related to Citgo's payment of expenses on behalf of PDVSA during June 2015, produced as PDVH_Girard Street_000019408 (HIGHLY CONFIDENTIAL).

311. Attached as **Exhibit 309** is a true and correct copy of Exhibits A and B to the FARA Registration Statement submitted by PDV USA, Inc. on December 31, 2020, produced as G_000036811.

312. Attached as **Exhibit 310** is a true and correct copy of an April 28, 2021 email from Donna Land to: John Zuklic and Robert Shoemaker with an excerpt of attachment "OVERDUE AOMs MAR21_4.21.21.xlsx", produced as PDVH_Girard Street_000089174 (HIGHLY CONFIDENTIAL).

313. Attached as **Exhibit 311** is a true and correct copy of the November 28, 2022 memorandum titled "Individuals and Entities Accused in the Public Record of Corruption Involving PDVSA," from PDVH to the PDVSA Ad Hoc Board and produced as PDVH_Girard Street_000140637 (CONFIDENTIAL).

314. Attached as **Exhibit 312** is a true and correct copy of a March 4, 2015 letter on Citgo's letterhead from Nelson Martínez, the Chairman, President, and CEO of Citgo, regarding "Declaración de Dividendos US \$363,900,000.00" and produced as PDVH_Girard Street_000010181 (CONFIDENTIAL).

315. Attached as **Exhibit 313** is a true and correct copy of a July 21, 2015 email from Jose Pereira to Richard Lopez, Gina Coon, and Gustavo Cardenas, regarding “Request to support the Venezuelan UN Mission to purchase computer equipment,” produced as PDVH_Girard Street_000080037 (CONFIDENTIAL).

316. Attached as **Exhibit 314** is a true and correct copy of a September 24, 2015 email from Gustavo Cardenas to Barry Treas, with copies to Michael Ballantine, Jose Pereira, John Butts, Patricia Milano, and Richard Lopez, regarding “Approval for CITGO Support Services,” produced as PDVH_Girard Street_000080036 (CONFIDENTIAL).

317. Attached as **Exhibit 315** is a true and correct copy of a November 18, 2015 email from Gina Coon to Richard Lopez and Kathryn O’Brien regarding “2015 11 20 UC B0D PDV Holding Capital Contribution to PDV USA-\$3MM,” produced as PDVH_Girard Street_000007917 (CONFIDENTIAL).

318. Attached as **Exhibit 316** is a true and correct copy of the Unanimous Written Consent of the Board of Directors of PDVH dated November 20, 2015 and produced as PDVH_Girard Street_000007919 (CONFIDENTIAL).

319. Attached as **Exhibit 317** is a true and correct copy of a July 22, 2021 email from Fernando Vera to Elisa Totaro and Carlos Jordá, with copies to Mireya Ripanti, Horacio Medina, and Virginia Zamora, regarding revisions to a presentation on “2020 and Q1 2021 Results,” produced as PDVSA_0047104 (HIGHLY CONFIDENTIAL).

320. Attached as **Exhibit 318** is a true and correct copy of a Diario Las Americas news article: “Secret bank account reveals the lavish lifestyle of Chavezs daughters in New York,” dated December 11, 2024 and produced as G_000118801.

321. Attached as **Exhibit 319** is a true and correct copy of a Consulting Agreement by and between PDV USA and Interamerican Consulting, Inc., dated March 21, 2017 and produced as PDVH_Girard Street_000007796 (CONFIDENTIAL).

322. Attached as **Exhibit 320** is a true and correct copy of a presentation titled “PDV Holding Inc. Receivable Balance Analysis DRAFT” for a “Board of Directors Meeting [February 2022],” produced as PDVH_Girard Street_000020418 (CONFIDENTIAL).

323. Attached as **Exhibit 321** is a true and correct copy of a presentation bearing Citgo and PDVSA’s logos titled “PDV USA Funding Plan (March – May 2017),” revised on March 18, 2017, with excerpts of the attached spreadsheet with the data underlying the presentation, as PDVH_Girard Street_000009917 (CONFIDENTIAL).

324. **Exhibit 322** is intentionally omitted.

325. Attached as **Exhibit 323** is a true and correct copy of PDVH Minutes of a Special Meeting of the Board of Directors, dated April 21, 2020 and produced as PDVH_Girard Street_000000665 (HIGHLY CONFIDENTIAL).

326. Attached as **Exhibit 324** is a true and correct copy of excerpts from a spreadsheet containing PDVH cash activity, dated August 15, 2016 and produced as PDVH_Girard Street_000049334 (HIGHLY CONFIDENTIAL).

327. Attached as **Exhibit 325** is a true and correct copy of a Certification of Estimated Statement between EM vendor representative and PDV vendor representative, dated June 12, 2015 and produced as PDVH_Girard Street_000020802 (CONFIDENTIAL).

328. Attached as **Exhibit 326** is a true and correct copy of the Debt Assumption Agreement by PDV Chalmette and PDVSA, dated October 29, 2015 and produced as PDVH_Girard Street_000020797 (CONFIDENTIAL).

329. Attached as **Exhibit 327** is a true and correct copy of PDVH's Consolidated Financial Statements as of December 31, 2023 and 2022 with Independent Auditors' Report, dated April 18, 2024 and produced as PDVH_Girard Street_000007255 (CONFIDENTIAL).

330. Attached as **Exhibit 328** is a true and correct copy of excerpts of a PDVSA presentation, dated April 30, 2015 and produced as PDVH_Girard Street_000012195 (CONFIDENTIAL).

331. Attached as **Exhibit 329** is a true and correct copy of the April 30, 2015 email from: J. Butts, to: J. Toledo, re: FW: Document from this afternoon, produced as PDVH_Girard Street_000012194 (CONFIDENTIAL).

332. Attached as **Exhibit 330** is a true and correct copy of Citgo and PDVSA strategic planning and alignment presentation: "Medium Term Plan Business Strategies (Part 2) 2016-2021," dated December 9, 2015 and produced as PDVH_Girard Street_000031752 (HIGHLY CONFIDENTIAL).

333. Attached as **Exhibit 331** is a true and correct copy of excerpts of a Citgo and PDVSA Board of Directors meeting presentation: "Operational and Financial Results 2014 and Items for Approval for Business 2015," dated May 19, 2015 and produced as PDVH_Girard Street_000089725 (CONFIDENTIAL).

334. Attached as **Exhibit 332** is a true and correct copy of the Citgo and PDVSA meeting video call notes, dated June 19, 2015 and produced as PDVH_Girard Street_000111975 (CONFIDENTIAL).

335. Attached as **Exhibit 333** is a true and correct copy of a PDVH document: "Summary of Actions," produced as PDVSA_0004674 (HIGHLY CONFIDENTIAL).

336. Attached as **Exhibit 334** is a true and correct copy of the procurement services agreement between LDC Supply International, LLC and Petróleo, dated January 13, 2016 and produced as PDVH_Girard Street_000087462 (CONFIDENTIAL).

337. Attached as **Exhibit 335** is a true and correct copy of the Amendment to the Procurement Services Agreement, dated July 1, 2016 and produced as PDVH_Girard Street_000087470 (CONFIDENTIAL).

338. Attached as **Exhibit 336** is a true and correct copy of the LDC-Citgo Services Agreement, dated January 14, 2016 and produced as PDVH_Girard Street_000087471 (CONFIDENTIAL).

339. Attached as **Exhibit 337** is a true and correct copy of excerpts from Fernando J. Vera's personal deposition dated February 21, 2025 (CONFIDENTIAL).

340. Attached as **Exhibit 338** is a true and correct copy of excerpts from a spreadsheet containing PDVSA debt exchange valuation and Citgo equity analysis, dated 2019 and produced as UBS0000074 (HIGHLY CONFIDENTIAL).

341. Attached as **Exhibit 339** is a true and correct copy of a LDC Supply International, LLC financial spreadsheet as of December 31, 2016, produced as PDVH_Girard Street_000087454 (CONFIDENTIAL).

342. Attached as **Exhibit 340** is a true and correct copy of excerpts from a spreadsheet titled: "CITGO Petroleum Corporation to CITGO Holding, Inc. Financial Information Bridge," dated December 31, 2017 and produced as PDVH_Girard Street_000030572 (HIGHLY CONFIDENTIAL).

343. Attached as **Exhibit 341** is a true and correct copy of the February 10, 2017, email from: J Butts, to: J Pereira; R Lopez, re: Confirmación de saldos auditoria externa KPMG diciembre de 2016 - LDC, produced as PDVH_Girard Street_000087442 (CONFIDENTIAL).

344. Attached as **Exhibit 342** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087508 (CONFIDENTIAL).

345. Attached as **Exhibit 343** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087507 (CONFIDENTIAL).

346. Attached as **Exhibit 344** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087510 (CONFIDENTIAL).

347. Attached as **Exhibit 345** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087511 (CONFIDENTIAL).

348. Attached as **Exhibit 346** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087512 (CONFIDENTIAL).

349. Attached as **Exhibit 347** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087513 (CONFIDENTIAL).

350. Attached as **Exhibit 348** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” – between Citgo Petroleum Corporation, LDC Supply International, LLC, and PDVSA Petróleo, S.A, produced as PDVH_Girard Street_000087514 (CONFIDENTIAL).

351. Attached as **Exhibit 349** is a true and correct copy of the January 13, 2016 “Exhibit A - Notice of Designation” from Citgo Petroleum Corporation to PPSA, re: Procurement Services Agreement (PSA) and Payment Instruction Letter, produced as PDVH_Girard Street_000087515 (CONFIDENTIAL).

352. Attached as **Exhibit 350** is a true and correct copy of the January 13, 2016, “Exhibit A - Notice of Designation” from CITGO Petroleum Corporation to PPSA, re: Procurement Services Agreement (PSA) and Payment Instruction Letter, produced as PDVH_Girard Street_000087518 (CONFIDENTIAL).

353. Attached as **Exhibit 351** is a true and correct copy of the PDVSA board resolution approving funding of the Citgo Aruba project, dated March 14, 2016 and produced as PDVH_Girard Street_000057949 (CONFIDENTIAL).

354. Attached as **Exhibit 352** is a true and correct copy of PDVH’s Consolidated Financial Statements as of December 31, 2017 and 2016 with Independent Auditors’ Report, dated June 28, 2018 and produced as PDVH_Girard Street_000015309 (HIGHLY CONFIDENTIAL).

355. Attached as **Exhibit 353** is a true and correct copy of the January 20, 2020 letter from PDV Holding, Inc. to Dr. Luis A. Pacheco re: “Negotiation of Termination of Aruba Refinery Project,” produced as PDVSA_0000714 (HIGHLY CONFIDENTIAL).

356. Attached as **Exhibit 354** is a true and correct copy of July 21, 2016 email from: R. Lopez, to: luongoj@pdvsa.com, re: Resolution of the PDVSA Board of Directors (Progress of the Second Phase of the CITGO Integration Project), produced as PDVH Girard Street_000057951 (CONFIDENTIAL).

357. Attached as **Exhibit 355** is a true and correct copy of a PDVSA and Citgo presentation slide: “Funding Strategy – support documents,” produced as PDVH Girard Street_000057941 (CONFIDENTIAL).

358. Attached as **Exhibit 356** is a true and correct copy of a presentation regarding the Aruba project, dated 2019 and produced as PDVH_Girard Street_000008499 (HIGHLY CONFIDENTIAL).

359. Attached as **Exhibit 357** is a true and correct copy of the May 23, 2021 letter to H. Medina, from: PDVH Board of Directors, submitting summary of activities carried out by PDVH and subsidiaries in 2020, produced as PDVH_Girard Street_000134838 (HIGHLY CONFIDENTIAL).

360. Attached as **Exhibit 358** is a true and correct copy of a spreadsheet titled: “Citgo Holding, Inc. to PDV Holding, Inc. – Consolidated Balance Sheet Bridge,” dated September 30, 2024 and produced as PDVH_Girard Street_000030900 (HIGHLY CONFIDENTIAL).

361. Attached as **Exhibit 359** is a true and correct copy of a spreadsheet titled: “Citgo Petroleum Corporation to Citgo Holding, Inc. Financial Information Bridge,” dated December 31, 2017 and produced as PDVH_Girard Street_000030571 (HIGHLY CONFIDENTIAL).

362. Attached as **Exhibit 360** is a true and correct copy of a spreadsheet titled, “Citgo Holding, Inc. to PDV Holding, Inc. – Balance Sheet Bridge,” dated December 31, 2020 and produced as PDVH_Girard Street_000030577 (HIGHLY CONFIDENTIAL).

363. Attached as **Exhibit 361** is a true and correct copy of the June 5, 2019 letter from: L. Pacheco, to: L. Palacios, re: Support of PDVH Holding and Corporate Entities related to the Aruba Matters, produced as PDVSA_0000722 (HIGHLY CONFIDENTIAL).

364. Attached as **Exhibit 362** is a true and correct copy of PDVH minutes of a special meeting of the board of directors, dated April 30, 2020 and produced as PDVH_Girard Street_000000682 (CONFIDENTIAL).

365. Attached as **Exhibit 363** is a true and correct copy of PDVH’s Consolidated Financial Statements as of December 31, 2019 and 2018 with Independent Auditors’ Report, dated June 29, 2023 and produced as PDVH_Girard Street_000007383 (CONFIDENTIAL).

366. Attached as **Exhibit 364** is a true and correct copy of an Argus news article: “Citgo top executives arrested over alleged loan deal,” dated November 21, 2017 and produced as G_000096304.

367. Attached as **Exhibit 365** is a true and correct copy of a NBC news article: “Jailed Citgo executives, 5 of them U.S. citizens, are in limbo amid Venezuela turmoil,” dated February 19, 2019.

368. Attached as **Exhibit 366** is a true and correct copy of a PBS news article: “6 U.S. Citgo executives convicted and sentenced to prison in Venezuela,” dated November 27, 2020 and produced as G_000121662.

369. Attached as **Exhibit 367** is a true and correct copy of excerpts from Humberto Briceño León’s deposition dated February 26, 2025 (CONFIDENTIAL).

370. Attached as **Exhibit 368** is a true and correct copy of a YouTube video titled: “President and 5 senior executives of Citgo arrested, announces Attorney General Tarek William Saab,” dated November 21, 2017 and produced as G_000098025.

371. Attached as **Exhibit 369** is a true and correct copy of a Lexis news article: “Venezuela arrests top execs of state-owned Citgo,” dated November 21, 2017.

372. Attached as **Exhibit 370** is a true and correct copy of a Lexis news article: “Detained for corruption officials of Venezuela's oil company subsidiary,” dated November 21, 2017.

373. Attached as **Exhibit 371** is a true and correct copy of the PDVSA Alternative Proposal for Restructuring the Debt of Citgo and Citgo Holding and corresponding presentation, dated June 14, 2017 and produced as PDVH_Girard Street_000089683 (HIGHLY CONFIDENTIAL).

374. Attached as **Exhibit 372** is a true and correct copy of a Youtube video titled: “Attorney General confirms arrest of former PDVSA president Eulogio Del Pino and Nelson Martínez,” dated November 30, 2017 and produced as G_000096784.

375. Attached as **Exhibit 373** is a true and correct copy of a TSJ Venezuela X/Twitter post: “Court of Judgment of Caracas Sentenced Former Citgo Officers to Prison,” dated November 26, 2020 and produced as G_000096808.

376. Attached as **Exhibit 374** is a true and correct copy of the Official Gazette of Venezuela, No. 6.699 extraordinary, dated May 2, 2022 and produced as PDVH_Girard Street_000037015.

377. **Exhibit 375** is intentionally omitted.

378. Attached as **Exhibit 376** is a true and correct copy of the expert report of Dr. Hernando Díaz-Candia in opposition to the report of Humberto Briceño León, dated February 12, 2025 (CONFIDENTIAL).

379. Attached as **Exhibit 377** is a true and correct copy of the expert report of Humberto Briceño León, dated January 29, 2025 (HIGHLY CONFIDENTIAL).

380. Attached as **Exhibit 378** is a true and correct copy of the government of Venezuela's legal opinion re: "9.25% CITGO Holding Inc. (2024)" bond, dated December 3, 2019 and produced as PDVSA_0006133 (CONFIDENTIAL).

381. Attached as **Exhibit 379** is a true and correct copy of a PDVSA press release: "President Maduro Appoints Asdrúbal Chávez as new President of Citgo," dated November 22, 2017 and produced as G_000121458.

382. Attached as **Exhibit 380** is a true and correct copy of a Law360 article: "US Blacklists Foreign Judge, Prosecutor over 'Citgo 6' Trial," dated January 4, 2021.

383. Attached as **Exhibit 381** is a true and correct copy of the November 13, 2018 email from: J. Chang, to: C. Rowe, re: Q&A with attachment titled: "2018 Q2 CITGO Investor CALL QA_FIN RPTG.doc", produced as PDVH_Girard Street_000131865 (CONFIDENTIAL).

384. Attached as **Exhibit 382** is a true and correct copy of the March 9, 2022 U.S. Embassy in Chile press statement: "Release of U.S. Citizens Gustavo Cardenas and Jorge Alberto Fernandez from Venezuela."

385. Attached as **Exhibit 383** is a true and correct copy of a Washington Post article: "Venezuela releases 2 imprisoned Americans after rare trip by U.S. officials," dated March 9, 2022.

386. Attached as **Exhibit 384** is a true and correct copy of a NBC news article: "It doesn't seem real': American freed from jail in Venezuela is home with his family," dated March 9, 2022.

387. Attached as **Exhibit 385** is a true and correct copy of the October 1, 2022 U.S. Embassy in Chile press statement: "The Release of U.S. Nationals from Venezuela."

388. Attached as **Exhibit 386** is a true and correct copy of a CNN news article: "Ending a 'nightmare' in Venezuela: How the US government brought seven Americans home," dated November 23, 2023.

389. Attached as **Exhibit 387** is a true and correct copy of Willkie Farr & Gallagher LLP's FARA amendment to registration statement, filed June 16, 2023 and produced as G_000320163.

390. Attached as **Exhibit 388** is a true and correct copy of Resolution No. 164 from the Office of the Minister of the Bolivarian Republic of Venezuela, published in "Gaceta Oficial," dated November 26, 2017 and produced as G_000121676.

391. Attached as **Exhibit 389** is a true and correct copy of a Law360 news article: "Ex-Citgo Execs Jailed In Venezuela For 5 Years File \$400M Suit," dated May 30, 2024.

392. Attached as **Exhibit 390** is a true and correct copy of the complaint filed as ECF No. 1 in *OI European Group B.V. v. Bolivarian Republic of Venezuela, et al.*, 19-cv-00290-LPS (D. Del.) ("OI Eur. Grp."), dated February 11, 2019 and produced as G_000001860.

393. **Exhibit 391** is intentionally omitted.

394. Attached as **Exhibit 392** is a true and correct copy of Decree No. 44 issued in Venezuelan Official Gazette, dated April 12, 2018 and produced as G_000110203.

395. Attached as **Exhibit 393** is a true and correct copy of BBC article titled “Venezuela election: Maduro wins second term amid claims of vote rigging”, dated May 21, 2018.

396. Attached as **Exhibit 394** is a true and correct copy of Statement from President Donald J. Trump Recognizing Venezuelan National Assembly President Juan Guaidó as the Interim President of Venezuela, dated January 23, 2019 and produced as PDVSA_0034442.

397. Attached as **Exhibit 395** is a true and correct copy of Statute to Govern a Transition to Democracy to Reestablish the Full Force and Effect of the Constitution of the Bolivarian Republic of Venezuela,” issued by the National Assembly of Venezuela, dated February 5, 2019 and produced as PDVSA_0003293.

398. Attached as **Exhibit 396** is a true and correct copy of an article titled “Reality of PDVSA AD HOC: transparency efficiency legality”, dated July 3, 2024 and produced as G_000323292.

399. Attached as **Exhibit 397** is a true and correct copy of Legislative Gazette issue No. 66, dated January 3, 2023 and produced as PDVSA_0003196.

400. Attached as **Exhibit 398** is a true and correct copy of Decree No. 3 issued by Juan Guaidó, President of the National Assembly, dated April 10, 2019 and produced as G_000006711.

401. Attached as **Exhibit 399** is a true and correct copy of National Assembly of the Bolivarian Republic of Venezuela’s Agreement Authorizing the Interim President of the Republic, Juan Gerardo Guaido Marquez, to Expand the Powers Granted and the Number of Members of the Ad Hoc Administrative Board of PDVSA, dated April 10, 2019 and produced as PDVSA_0004847.

402. Attached as **Exhibit 400** is a true and correct copy of Venezuela's National Assembly's "Gaceta Legislativa No 13." dated October 24, 2019, and produced as G_000109915.

403. Attached as **Exhibit 401** is a true and correct copy of an article published by Petroguia, "Horacio Medina: 'The right thing is for Citgo to pay PDVSAs debts and make a restructuring of the sovereign debt'", dated January 22, 2025.

404. Attached as **Exhibit 402** is a true and correct copy of PDV Holding's "Minutes of a Special Meeting of the board of Directors dated October 29, 2020," and produced as PDVH_Girard Street_000000748 (CONFIDENTIAL).

405. Attached as **Exhibit 403** is a true and correct copy of Gaceta Legislativa No. 14 of the National Assembly of Venezuela dated November 27, 2019, and produced as PDVSA_0001386.

406. Attached as **Exhibit 404** is a true and correct copy of Executive Order 13850, Blocking Property of Additional Persons Contributing to the Situation in Venezuela, dated November 1, 2018, and produced as G_000096785.

407. Attached as **Exhibit 405** is a true and correct copy of Executive Order 13884, Blocking Property of the government of Venezuela, dated August 5, 2019, and produced as G_000095728.

408. Attached as **Exhibit 406** is a true and correct copy of CITGO Petroleum Corporation's company profile slides, "CITGO Petroleum Corporation Perfil de la Comania," dated May 2021 and produced as PDVH_Girard Street_000018174 (HIGHLY CONFIDENTIAL).

409. Attached as **Exhibit 407** is a true and correct copy of Gaceta Legislativa No. 4 of the National Assembly of Venezuela, dated February 20, 2019 and produced as PDVSA_0006667.

410. Attached as **Exhibit 408** is a true and correct copy of an Affidavit of Accuracy regarding “Office of the President of the Bolivarian Republic of Venezuela, Decree No. 3, April 10, 2019” signed by C. Crooks, notarized by L. Chan, dated June 2, 2020 and produced as PDVSA_0003255.

411. Attached as **Exhibit 409** is a true and correct copy of the Venezuelan legislative gazette No. 4, dated February 20, 2019 and produced as PDVSA_0000416.

412. Attached as **Exhibit 410** is a true and correct copy of a Reuters article: “Citgo Petroleum cash builds, with dividends to parent frozen,” dated September 3, 2019 and produced as G_000095940.

413. Attached as **Exhibit 411** is a true and correct copy of the article “Asamblea Nacional Nombra Junta Directiva de Citgo,” dated February 13, 2019.

414. Attached as **Exhibit 412** is a true and correct copy of a twitter post by Juan Guaido regarding Citgo’s Board of Directors, dated February 13, 2019 and produced as G_000319384.

415. Attached as **Exhibit 413** is a true and correct copy of the article: “Guadio: We began the reconstruction of Venezuela with the appointment of Citgo’s board of directors,” dated August 28, 2019.

416. Attached as **Exhibit 414** is a true and correct copy of “PDV Holding, inc. Waiver of Notice and Written Consent of the Sole Stockholder in Lieu of a Special Meeting,” dated February 15, 2019 and produced as PDVH_Girard Street_000000490 (HIGHLY CONFIDENTIAL).

417. Attached as **Exhibit 415** is a true and correct copy of the “Waiver of Notice and Written Consent of Sole Shareholder in Lieu of a Special Meeting” dated February 15, 2019, and produced as PDVH_Girard Street_000134949 (CONFIDENTIAL).

418. Attached as **Exhibit 416** is a true and correct copy of the “Waiver of Notice and Written Consent of Sole Shareholder in Lieu of a Special Meeting,” dated February 15, 2019 and produced as PDVH_Girard Street_000134984 (CONFIDENTIAL).

419. Attached as **Exhibit 417** is a true and correct copy of a National Assembly press release: “President (In Office) announces appointments of Citgo CEO and Commission for Renegotiation of Public Debt,” dated August 16, 2019.

420. Attached as **Exhibit 418** is a true and correct copy of a letter from Luisa Palacios to Dr. Luis A. Pacheco, regarding the appointment of Carlos Jordá to the board of directors, dated November 20, 2019 and produced as PDVH_Girard Street_000008546 (CONFIDENTIAL).

421. Attached as **Exhibit 419** is a true and correct copy of a letter from L. Pacheco to L. Palacios regarding the Appointment of Carlos Jordá, Marecel Laprea Bigott and Pablo Perez dated July 11, 2020 and produced as PDVSA_0000007 (CONFIDENTIAL).

422. Attached as **Exhibit 420** is a true and correct copy of an email from L. Palacios to M. Ripanti regarding “07142020 noon CITGO ENTITIES 2019 REPORT LP enviado y MR rev” and the attachment “07142020 noon CITGO Shareholder Report 2019 LP.docx,” dated July 14, 2020, and produced as PDVH_Girard Street_000038390 (CONFIDENTIAL).

423. Attached as **Exhibit 421** is a true and correct copy of the “Summary of Activities CITGO Petroleum Corporation and CITGO Holding,” dated December 31, 2019 and produced as PDVH_Girard Street_000038391 (HIGHLY CONFIDENTIAL).

424. Attached as **Exhibit 422** is a true and correct copy of an email from C. Martinez to L. Pacheco regarding CITGO chain appointments, dated November 5, 2020 and produced as PDVSA_0000476 (CONFIDENTIAL).

425. Attached as **Exhibit 423** is a true and correct copy of an email from L. Pacheco to C. Jorda, E. Rincon, P. Pere, and F. Vera regarding CITGO Holding, dated October 31, 2020 and produced as PDVSA_0000477 (CONFIDENTIAL).

426. Attached as **Exhibit 424** is a true and correct copy of a letter from Horacio Medina Herrera to Juan G. Guaido Marquez regarding the “Appointment of Andres Irigoyen Lima as Member of the Board of Directors of PDV Holdings Inc. And Citgo Holdings Inc.,” dated December 17, 2020 and produced as PDVSA_0000819 (CONFIDENTIAL).

427. Attached as **Exhibit 425** is a true and correct copy of the “Minutes of a Special Meeting of the Board of Directors of PDV Holding, Inc.” dated December 29, 2020, and produced as PDVH_Girard Street_000000815 (CONFIDENTIAL).

428. Attached as **Exhibit 426** is a true and correct copy of a letter from J. Guaido to H. Medina regarding the appointment of A. Lina as Director of PDV Holdings Inc., dated January 11, 2021 and produced as PDVSA_000002 (CONFIDENTIAL).

429. Attached as **Exhibit 427** is a true and correct copy of the Minutes of the PDVSA Ad Hoc Board, dated June 14, 2021 and produced as PDVSA_0046871 (HIGHLY CONFIDENTIAL).

430. Attached as **Exhibit 428** is a true and correct copy of a letter from PDVSA Ad Hoc Board to F. Vera regarding new appointments and replacements in the corporate chain, dated June 15, 2021 and produced as PDVSA_0000203 (CONFIDENTIAL).

431. Attached as **Exhibit 429** is a true and correct copy of an email from L Rincon to H. Medina Copying W. Belloso, S. Wilhel, F. Vera, C. Corda , A. Olmeta, and J. Lynch regarding the “Summary of our conversation Re: PDVH Governance,” dated September 28, 2021 and produced as PDVSA_0000055 (CONFIDENTIAL).

432. Attached as **Exhibit 430** is a true and correct copy of a letter from [REDACTED]

[REDACTED]

[REDACTED]

433. Attached as **Exhibit 431** is a true and correct copy of an email from Luis Pacheco to L. Palacios and F. Vera regarding a “Request for information from President (E) Juan Guaido,” dated August 4, 2019 and produced as PDVSA_0040834 (CONFIDENTIAL).

434. Attached as **Exhibit 432** is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

435. Attached as **Exhibit 433** is a true and correct copy of an email from P. Perez to H. Medina, S. Wilhelm Belloso and L. Giusti Lugo regarding Corporate Chain Note dated February 3, 2022 and produced as PDVSA_0048903 (HIGHLY CONFIDENTIAL).

436. Attached as **Exhibit 434** is a true and correct copy of a letter from H. Medina to B. T. Smith regarding “General License No. 5L – Venezuela Sanctions Regulations,” dated October 13, 2023 and produced as PDVSA_0005700 (HIGHLY CONFIDENTIAL).

437. Attached as **Exhibit 435** is a true and correct copy of a letter from H. Medina to M. Smith regarding General License No5M – Venezuela Sanctions Regulation, dated January 12, 2024 and produced as PDVSA_0005769 (HIGHLY CONFIDENTIAL).

438. Attached as **Exhibit 436** is a true and correct copy of an email from K. Cochrane to J. Hernandez regarding “PDVSA April Bond Payment,” dated April 3, 2019 and produced as PDVSA_0035805 (HIGHLY CONFIDENTIAL).

439. Attached as **Exhibit 437** is a true and correct copy of a letter from J. Hernandez to A. Gacki regarding the Venezuela Sanctions License Application by President Juan Guadio for Authorization Related to Payment of Interest on PDVSA Notes due 2020, dated April 3, 2019 and produced as PDVSA_0034722 (HIGHLY CONFIDENTIAL).

440. Attached as **Exhibit 438** is a true and correct copy of an email from C. Jorda to L. Pacheco regarding “RE: PDVSA 2020 Bond Private and Confidential,” dated October 21, 2019 and produced as PDVSA_0046264 (CONFIDENTIAL).

441. Attached as **Exhibit 439** is a true and correct copy of PDVH’s Responses and Objections to Plaintiffs’ First Set of Requests for Admission, served in Girard Street on February 24, 2025.

442. **Exhibit 440** is intentionally omitted.

443. Attached as **Exhibit 441** is a true and correct copy of the Ad Hoc Board of Petróleos de Venezuela, S.A.’s Exhibit A to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938 as amended, Registration No. 6997, dated August 2, 2021 and produced as G_000319250.

444. Attached as **Exhibit 442** is a true and correct copy of the Ad Hoc Board of Petróleos de Venezuela, S.A.’s Exhibit A to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938 as amended, Registration No. 6995, dated August, 20, 2021 and produced as G_000319576.

445. Attached as **Exhibit 443** is a true and correct copy of the Ad Hoc Board of Petróleos de Venezuela, S.A.’s Exhibit A to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938 as amended, Registration No. 6996, dated August 20, 2021, and produced as G_000320138.

446. Attached as **Exhibit 444** is a true and correct copy of an email from L. Pacheco to H. Medina, R. Prada, C. Balza, J. Cardenas, C. Martine, S. Antunez, J. Linares, and J. Pocaterra copying L. Palacios, F. Vera, and C. Jorda regarding “Carta a CPEP sobre Rendicion de Cuentas Agos 7 2020.pdf” dated August 7, 2020, and produced as PDVSA_0004211 (CONFIDENTIAL).

447. Attached as **Exhibit 445** is a true and correct copy of PDVH’s Responses and Objections to Plaintiffs’ First Set of Requests for Admission, served in G&A Strategic Invs. on February 24, 2025.

448. Attached as **Exhibit 446** is a true and correct copy of a Twitter post by PDVSA AD HOC OFICIAL dated July 10, 2024, and produced as G_000096779.

449. Attached as **Exhibit 447** is a true and correct copy of a Twitter post by PDVSA AD HOC OFICIAL regarding CITGO and Venezuela's Transition dated May 28, 2024, and produced as G_000095710.

450. Attached as **Exhibit 448** is a true and correct copy of the PDVSA article “President Maduro: Venezuela is Part of the World’s Energy Equation” dated December 1, 2022, and produced as G_000001632.

451. Attached as **Exhibit 449** is a true and correct copy of the article “AN Legitima aclara situacion sobre CITGO Petroluem” dated May 6, 2023.

452. Attached as **Exhibit 450** is a true and correct copy of PDVSA’s Ad-Hoc Administrative Board’s February 2025 statement: “To the Public Opinion.”

453. Attached as **Exhibit 451** is a true and correct copy of a post on X by PDVSA AD HOC OFICIAL dated February 7, 2025.

454. Attached as **Exhibit 452** is a true and correct copy of a letter from: Consejo de Administración y Protección de Activos [CAPA] to: Secretary of State A. Blinken re: Proposal for Resolution of Creditor Claims, dated June 28, 2023, and produced as G_000000289.

455. Attached as **Exhibit 453** is a true and correct copy of the Venezuelan National Assembly’s “Agreement Authorizing the Appointment to Hold the Positions of the Intervention Entity, named ‘Ad-Hoc Administrative Board’ to Assume the Functions of the Shareholders Meeting,” dated February 13, 2019 and produced as G_000011494.

456. Attached as **Exhibit 454** is a true and correct copy of a letter from Horacio Medina, Chairman of the PDVSA Ad Hoc Board to: United States Department of Treasury re: Blocked Assets of PDVSA, dated July 6, 2023, and produced as PDVSA_0005656.

457. Attached as **Exhibit 455** is a true and correct copy of talking points for a meeting between the PDVSA Ad Hoc Board, CAPA, and the National Assembly, dated September 1, 2023, and produced as PDVSA_0005660.

458. Attached as **Exhibit 456** is a true and correct copy of the exhibits to the declaration of Barbara Miranda, filed as ECF No. 52 in OI Eur. Grp., dated February 19, 2021.

459. Attached as **Exhibit 457** is a true and correct copy of the executed version the indenture among Citgo Holding, Inc. and Wilmington Savings Fund Society, FSB, dated February 12, 2015 and produced as PDVH_Girard Street_000118399 (CONFIDENTIAL).

460. Attached as **Exhibit 458** is a true and correct copy of the U.S. Department of the Treasury Venezuela Sanctions Regulations License Amendment No. VENEZUELA-EO13850-2020-365614-2, dated August 11, 2022 and produced as PDVH_Girard Street_000031937 (HIGHLY CONFIDENTIAL).

461. Attached as **Exhibit 459** is a true and correct copy of the November 16, 2015 email from G. Coon to C. Yang; G. Murphy; C. Okruhlik, re: With Holding Taxes, produced as PDVH Girard Street_000112148 (CONFIDENTIAL).

462. Attached as **Exhibit 460** is a true and correct copy of PDVH board of directors meeting presentation: “PDVSA Ad Hoc Services Agreement,” dated June 29, 2021 and produced as PDVH_Girard Street_000107680 (HIGHLY CONFIDENTIAL).

463. Attached as **Exhibit 461** is a true and correct copy of PDVH directors’ consent to action in lieu of a special meeting dated May 7, 2019 and produced as PDVH_Girard Street_000000551 (CONFIDENTIAL).

464. Attached as **Exhibit 462** is a true and correct copy of the May 9, 2019 email from: F. Vera, to: R. Esser; G. Coon; C. Rowe; and J. Colbert, re: Instruction from Paying Agent 2020Bond, produced as PDVH_Girard Street_000008472 (CONFIDENTIAL).

465. Attached as **Exhibit 463** is a true and correct copy of the May 13, 2019, email from: F. Vera, to: pachecola@outlook.com, re: LDC payment to Delaware Trust, produced as PDVSA_0036946 (CONFIDENTIAL).

466. Attached as **Exhibit 464** is a true and correct copy of the May 13, 2019 email from: L Pacheco, to: T Musarra, re: LDC payment to Delaware Trust, produced as PDVSA_0036976 (CONFIDENTIAL).

467. Attached as **Exhibit 465** is a true and correct copy of the February 24, 2021 email from: H. Shuler, to: C. Jorda, re: DCO for Products, produced as PDVH_Girard Street_000080004 (HIGHLY CONFIDENTIAL).

468. Attached as **Exhibit 466** is a true and correct copy of an excerpt of a spreadsheet showing balancing transfers from subsidiaries to PDVH, produced as PDVH_Girard Street_000045515 (HIGHLY CONFIDENTIAL).

469. Attached as **Exhibit 467** is a true and correct copy of the January 8, 2018 letter from: P Solano, To: E Manrique, re: Notice of Outstanding Payment, produced as G_000307168 (CONFIDENTIAL).

470. Attached as **Exhibit 468** is a true and correct copy of PDVH's Directors' Consent to Action In lieu of a Special Meeting, dated March 9, 2020 and produced as PDVH_Girard Street_000000627 (HIGHLY CONFIDENTIAL).

471. Attached as **Exhibit 469** is a true and correct copy of the March 29, 2021 email from M. Ripanti to J. Cardenas; hormed20-21pdv@hushmail.com; F. Vera, re: Datos Pagos de Facturas, produced as PDVSA_0004672 (HIGHLY CONFIDENTIAL).

472. Attached as **Exhibit 470** is a true and correct copy of PDV Holding, Inc's Objections and Responses to Plaintiffs Girard Street Investment Holding's First Set of Interrogatories in Girard Street Inv. Holdings, served on November 18, 2024.

473. Attached as **Exhibit 471** is a true and correct copy of PDVH Minutes of a Special Meeting of the Board of Directors, dated September 16, 2022 and produced as PDVH_Girard Street_000001087 (CONFIDENTIAL).

474. Attached as **Exhibit 472** is a true and correct copy of the U.S. Department of the Treasury Venezuela Sanctions Regulations License No. VENEZUELA-EO13850-2021-873266-1, dated June 3, 2022 and produced as PDVH_Girard Street_000031513 (HIGHLY CONFIDENTIAL).

475. Attached as **Exhibit 473** is a true and correct copy of an excerpt of a spreadsheet with data underlying PDVH netting process for PDVSA receivables, produced as PDVH_Girard Street_000017697 (CONFIDENTIAL).

476. Attached as **Exhibit 474** is a true and correct copy of an excerpt of a spreadsheet with data underlying PDVH netting process for PDVSA receivables, specifically rejected items, dated December 7, 2022 and produced as PDVH_Girard Street_000017968 (CONFIDENTIAL).

477. Attached as **Exhibit 475** is a true and correct copy of PDVSA's Information Memorandum for "6.00% senior notes due 2022, dated October 16, 2014 and produced as PDVSA_0024333 (CONFIDENTIAL).

478. Attached as **Exhibit 476** is a true and correct copy of excerpts from a financial spreadsheet containing information for Citgo Petroleum, Citgo Holding, and PDVH, produced as PDVH_Girard Street_000058002 (CONFIDENTIAL).

479. Attached as **Exhibit 477** is a true and correct copy of a PDVH Board Meeting presentation: “PDV USA,” dated July 11, 2019 and produced as PDVH_Girard Street_000140371 (CONFIDENTIAL).

480. Attached as **Exhibit 478** is a true and correct copy of PDV USA and PDVH transactions audit, dated February 27, 2020 and produced as PDVH_Girard Street_000141043 (CONFIDENTIAL).

481. Attached as **Exhibit 479** is a true and correct copy of Horacio Medina’s FARA supplemental statement, filed December 1, 2023 and produced as G_000097564.

482. Attached as **Exhibit 480** is a true and correct copy of Horacio Medina’s FARA supplemental statement, filed May 29, 2024 and produced as G_000122428.

483. Attached as **Exhibit 481** is a true and correct copy of Horacio Medina’s FARA supplemental statement, filed June 1, 2023 and produced G_000121943.

484. Attached as **Exhibit 482** is a true and correct copy of a spreadsheet containing “PDV CH3 Available Funds” and PDVSA board members compensation, produced as PDVH_Girard Street_000140877 (CONFIDENTIAL).

485. Attached as **Exhibit 483** is a true and correct copy of the PDVSA Service Contract with J. Soteldo, dated August 14, 2023 and produced as PDVH_Girard Street_000140879 (CONFIDENTIAL).

486. Attached as **Exhibit 484** is a true and correct copy of the October 23, 2011 email from: J. Soteldo, to: M. Ripanti, re: Secrecario Ejucutivo, and attachment, produced as PDVH_Girard Street_000140876 (CONFIDENTIAL).

487. Attached as **Exhibit 485** is a true and correct copy of a October 2, 2023 invoice signed by Juan Soteldo, produced as PDVH_Girard Street_000140878 (CONFIDENTIAL).

488. Attached as **Exhibit 486** is a true and correct copy of Petróleos De Venezuela, S.A.'s and PDVSA Petróleo S.A.'s Objections and Responses to G&A Strategic Investment I LLC, et al.'s First Set of Requests for Production and First Set of Interrogatories in G&A Strategic Invs., served on November 18, 2024.

489. Attached as **Exhibit 487** is a true and correct copy of PDVH's FARA supplemental statement, filed September 30, 2022 and produced as G_000000016.

490. Attached as **Exhibit 488** is a true and correct copy of the draft September 2, 2022 letter from: H. Medina, to: J. Guadio, produced as PDVSA_0002723 (HIGHLY CONFIDENTIAL).

491. Attached as **Exhibit 489** is a true and correct copy of PDVH's FARA supplemental statement, filed March 28, 2024 and produced as G_000000001.

492. Attached as **Exhibit 490** is a true and correct copy of the April 14, 2023 email from: V. Fernando, to: gmarcano@cive-us.org; joaco0609@gmail.com; ruzcategui@cive-us.org; cmillan@cive-us.org; fblasi@cive-us.org; hormed20-21pdv@hushmail.com; J. Cardenas; R. Prada; and ivanlarasanchez@gmail.com, re: Meeting with CAPA, and attachment produced as PDVSA_0007735 (CONFIDENTIAL).

493. Attached as **Exhibit 491** is a true and correct copy of February 26, 2024 email from: F. Vera to: H. Medina; J. Cardenas; W. Belloso; S. Jorda; C. Rincon; E. Boscan; A. Padilla; P. Perez; E. Tortolero; G. Mavarez; J. Pocaterra; R. Kent; J. Lynch, re: Shareholder and Board Meetings, produced as PDVSA_0007774 (CONFIDENTIAL).

494. Attached as **Exhibit 492** is a true and correct copy of the February 28, 2024 email from: M. Ripanti, to: jpsoteldo@gmail.com, re: AHB Compensacion Febrero 2024 y reembolsables, produced as PDVH_Girard Street_000140923 (CONFIDENTIAL).

495. Attached as **Exhibit 493** is a true and correct copy of H. Medina's PDVSA Ad-Hoc board expense report, produced as PDVH_Girard Street_000140925 (CONFIDENTIAL).

496. Attached as **Exhibit 494** is a true and correct copy of February 2023-February 2024 receipts/invoices/reimbursables for Horacio Medina and Ricardo Prada, produced as PDVH_Girard Street_000140928 (CONFIDENTIAL).

497. Attached as **Exhibit 495** is a true and correct copy of the January 23, 2024 email from: M. Ripanti,to: hormed20-21pdv@hushmail.com; J. Cardenas; I. Lara; R. Prada re: Drafts Payment Process Altamira Cinema Corp, produced as PDVH_Girard Street_000140910 (CONFIDENTIAL).

498. Attached as **Exhibit 496** is a true and correct copy of PDVSA Audiovisual Production Contract, dated January 5, 2024 and produced as PDVH_Girard Street_000140917 (CONFIDENTIAL).

499. Attached as **Exhibit 497** is a true and correct copy of a National Assembly of Venezuela press release: "Public Prosecutor's Office assure that legitimate government will renegotiate external public debt," dated July 3, 2019 and produced as G_000109767.

500. Attached as **Exhibit 498** is a true and correct copy of the Venezuelan office of the special Attorney General’s “Guidelines for the Renegotiation of the Chávez/Maduro Era Legacy Public External Debt,” dated as July 1, 2019 and produced as G_000111846.

501. Attached as **Exhibit 499** is a true and correct copy of PDVH’s FARA supplemental statement, filed March 30, 2022 and produced as PDVH_Girard Street_000007685.

502. Attached as **Exhibit 500** is a true and correct copy of Carlos Jorda’s FARA short form registration statement, filed April 30, 2021 and produced as G_000319885.

503. Attached as **Exhibit 501** is a true and correct copy of Memorandum on CITGO Petroleum Corporation and 2020 PDVSA Bond Interest Payment Challenges CITGO Update and 2020 PDVSA Bond Interest Payment Challenges filed with FARA and received on April 30, 2021, produced as G_000319980.

504. Attached as **Exhibit 502** is a true and correct copy of PDV Holding, Inc.’s Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1938 for 6 Month Period Ending February 28, 2023 filed with FARA and received on March 30, 2023, produced as G_000001901.

505. Attached as **Exhibit 503** is a true and correct copy of “LA ASAMBLEA NACIONAL DE LA REPUBLICA BOLIVARIANA DE VENEZUELA SE DIRIGE AL PUEBLO VENEZOLANO PARA INFORMAR SOBRE LA SITUACIÓN DE CITGO PETROLEUM”.

506. Attached as **Exhibit 504** is a true and correct copy of a letter dated October 31, 2021 from J. Márquez to V. Aular regarding Bond Exchange Operation with Banco Central de Venezuela and Pension Funds, produced as PDVSA_0017522 (CONFIDENTIAL).

507. Attached as **Exhibit 505** is a true and correct copy of Klein/Johnson Group LLC Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1983, as amended for 6-month period ending May 31, 2024, produced as G_000320084.

508. Attached as **Exhibit 506** is a true and correct copy of H. Medina Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1983, as amended for 6-month period ending October 31, 2023.

509. Attached as **Exhibit 507** is a true and correct copy of PDVAS' X/Twitter post dated August 26, 2024 and produced as G_000096109.

510. Attached as **Exhibit 508** is a true and correct copy of X/Twitter post dated September 16, 2024 and produced as G_000095849.

511. Attached as **Exhibit 509** is a true and correct copy of PDV Holdings, Inc. Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1983, as amended for 6-month period ending August 31, 2023, produced as G_000002540.

512. Attached as **Exhibit 510** is a true and correct excerpt of Elecnor's 2017 Financial Statements and Directors' Report.

513. Attached as **Exhibit 511** is a true and correct copy of PDV Holdings, Inc. Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1983, as amended for 6-month period ending February 29, 2024, produced as G_000096569.

514. Attached as **Exhibit 512** is a true and correct copy of PDVSA's and Petróleo's Responses and Objections to Plaintiff's First Set of Requests for Production and First Set of Interrogatories, served in Girard Street Inv. Holdings on November 18, 2024.

515. Attached as **Exhibit 513** is a true and correct copy of August 28, 2019 email From: L. Pacheco, To: A. Grisanti; J. Cardenas; G. Velasquez; J. Hernandez, re: “Confidential - Rothschild revised financial proposition - for the exclusive use of PDVSA ad hoc board”, produced as PDVSA_0042310 (CONFIDENTIAL).

516. Attached as **Exhibit 514** is a true and correct copy of a presentation titled

[REDACTED]
[REDACTED]

517. Attached as **Exhibit 515** is a true and correct copy of PDV Holding, Inc.’s Report for the Quarterly Period Ended June 30, 2024, produced as PDVH_Girard Street_000007338 (CONFIDENTIAL).

518. Attached as **Exhibit 516** is a true and correct copy of

[REDACTED]
[REDACTED]

519. Attached as **Exhibit 517** is a true and correct copy of a January 5, 2015 email from: J Butts, To: J Pereira; C Rowe; J Sanchez, CC: K O’Brien; B Shoemaker; J Chang; R Lopez; D Weaver; D Land, re: “Strategy for DB Loan and General Strategy”, produced as PDVH_Girard Street_000141574 (CONFIDENTIAL).

520. Attached as **Exhibit 518** is a true and correct copy of the “Sanctions Overview” Presentation, dated September 8, 2021 and produced as PDVH_Girard Street_000046132 (CONFIDENTIAL).

521. Attached as **Exhibit 519** is a true and correct copy of a memo re: “updating of the liaison board of directors responsibilities-PDVSA”, dated July 1, 2015 and produced as PDVH_Girard Street_000072510 (CONFIDENTIAL).

522. Attached as **Exhibit 520** is a true and correct copy of a spreadsheet of Citgo financial projections, dated December 2014 and produced as PDVH_Girard Street_000010530 (CONFIDENTIAL).

523. Attached as **Exhibit 521** is a true and correct copy of the Supplemental Expert Report of Jonathan R. Macey, dated February 12, 2025 (HIGHLY CONFIDENTIAL).

524. Attached as **Exhibit 522** is a true and correct copy of the Council on Foreign Relations article: “Venezuela: The Rise and Fall of a Petrostate,” dated July 31, 2024 and produced as G_000095852.

525. Attached as **Exhibit 523** is a true and correct copy of a Citgo news release: “Citgo Aruba and the Aruban Government Finalized Agreement to Re-open Refinery,” dated June 11, 2016 and produced as G_000097850.

526. Attached as **Exhibit 524** is a true and correct copy of a January 5, 2022 email from: H. Medina, to: S. Wilhelm, re: “Note”, produced as PDVH_Girard Street_000123948 (CONFIDENTIAL).

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 19, 2025.

/s/ Evan Glassman
Evan Glassman